

<b>FORM 1</b> GENERAL	 <b>EPA</b>	<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>GENERAL INFORMATION</b> Consolidated Permits Program <i>(Read the "General Instructions" before starting.)</i>	<b>I. EPA I.D. NUMBER</b> <div style="border: 1px solid black; padding: 2px;">           F M I D 0 4 1 8 1 3 0 9 8 3 D         </div>
<b>LABEL ITEMS</b> <div style="border: 1px solid black; padding: 2px;"> <b>I. EPA I.D. NUMBER</b>  <b>III. FACILITY NAME</b>  <b>V. FACILITY MAILING ADDRESS</b>  <b>VI. FACILITY LOCATION</b> </div>		<div style="border: 1px solid black; padding: 10px; min-height: 150px;"> <b>PLEASE PLACE LABEL IN THIS SPACE</b> </div>	

**GENERAL INSTRUCTIONS**

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

**II. POLLUTANT CHARACTERISTICS**

**INSTRUCTIONS:** Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production; inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

**III. NAME OF FACILITY**

1 SKIP MARYSVILLE POWER PLANT

**IV. FACILITY CONTACT**

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 STERLING, M. DIRECTOR ENV AFF	3 1 3 2 3 7 8 6 1 8

**V. FACILITY MAILING ADDRESS**

A. STREET OR P.O. BOX			
3 2 0 0 0 SECOND AVENUE			
B. CITY OR TOWN		C. STATE	D. ZIP CODE
4 DETROIT		MI	4 8 2 2 6

**VI. FACILITY LOCATION**

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 3 0 1 GRATIOT BLVD			
B. COUNTY NAME			
ST CLAIR			
C. CITY OR TOWN		D. STATE	E. ZIP CODE
6 MARYSVILLE		MI	4 8 0 4 0
		F. COUNTY CODE (if known)	
		7 4	

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**II. PROCESSES (continued)**

3. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**V. DESCRIPTION OF HAZARDOUS WASTES**

**EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

**ENGLISH UNIT OF MEASURE**                      **CODE**  
 POUNDS ..... P  
 TONS ..... T

**METRIC UNIT OF MEASURE**                      **CODE**  
 KILOGRAMS ..... K  
 METRIC TONS ..... M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)												FOR OFFICIAL USE ONLY											
W M I D 0 4 1 8 1 3 0 9 8 1												W DUP											
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																							
W N O I Z	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)	D. PROCESSES													
										1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))									
1	D	0	0	2	220				T	S	0	2	S	0	4	T	0	2					
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26																							

**V. DESCRIPTION OF HAZARDOUS WASTE (continued)****E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

M	I	D	0	4	1	8	1	3	0	9	8	T/A	C	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

**F. FACILITY DRAWING**

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

**G. PHOTOGRAPHS**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

**H. FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes, &amp; seconds)

4	2	5	5	3	7	0
65	66	67	68	69	70	71

LONGITUDE (degrees, minutes, &amp; seconds)

0	8	2	2	2	7	3	8
72	73	74	75	76	77	78	79

**III. FACILITY OWNER**
☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

**X. OWNER CERTIFICATION**

certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

C. M. Heidel, Executive  
Vice President

B. SIGNATURE

C. M. Heidel

C. DATE SIGNED

11-17-80

**Y. OPERATOR CERTIFICATION**

certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

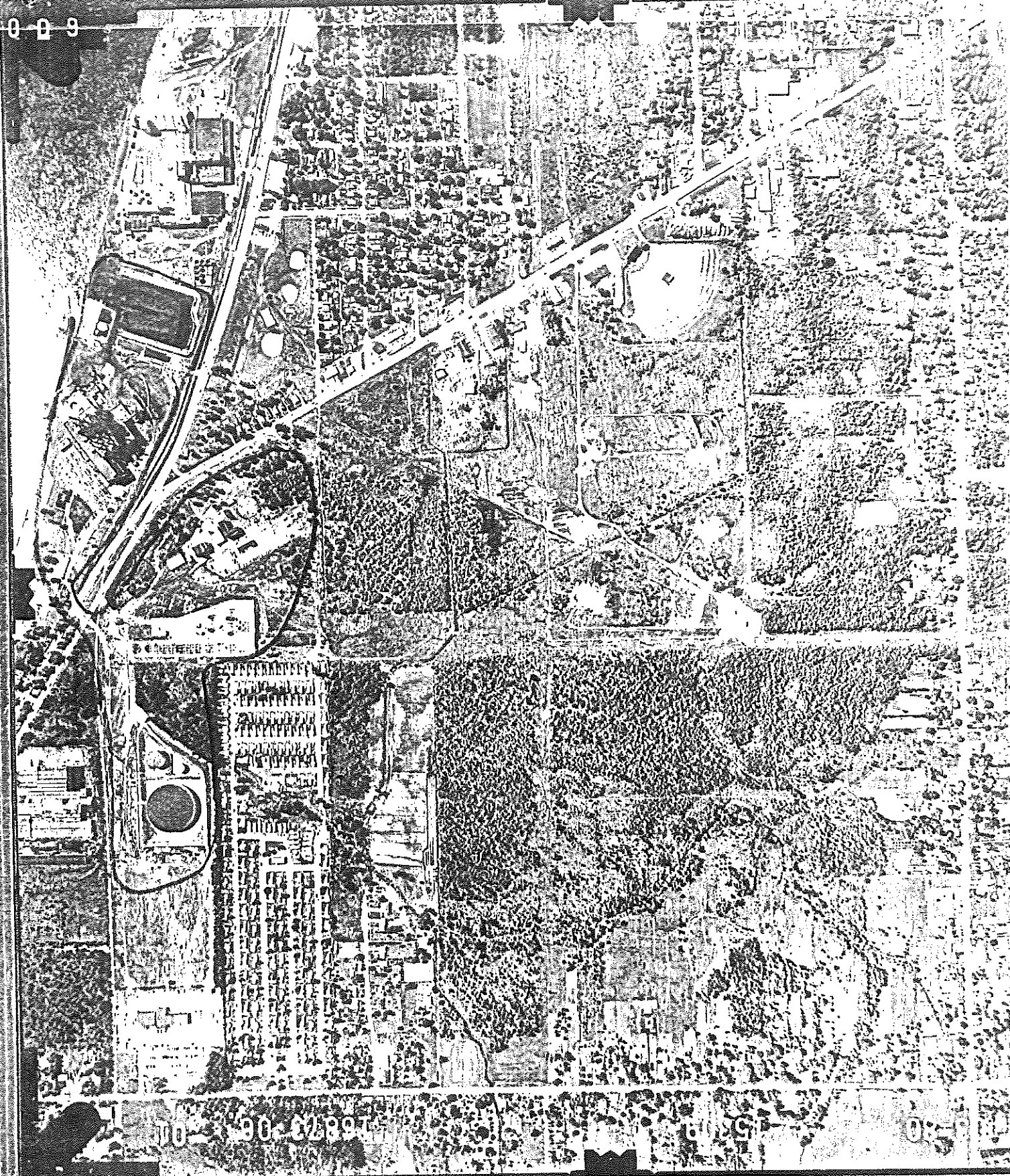
C. M. Heidel

C. DATE SIGNED

11-17-80



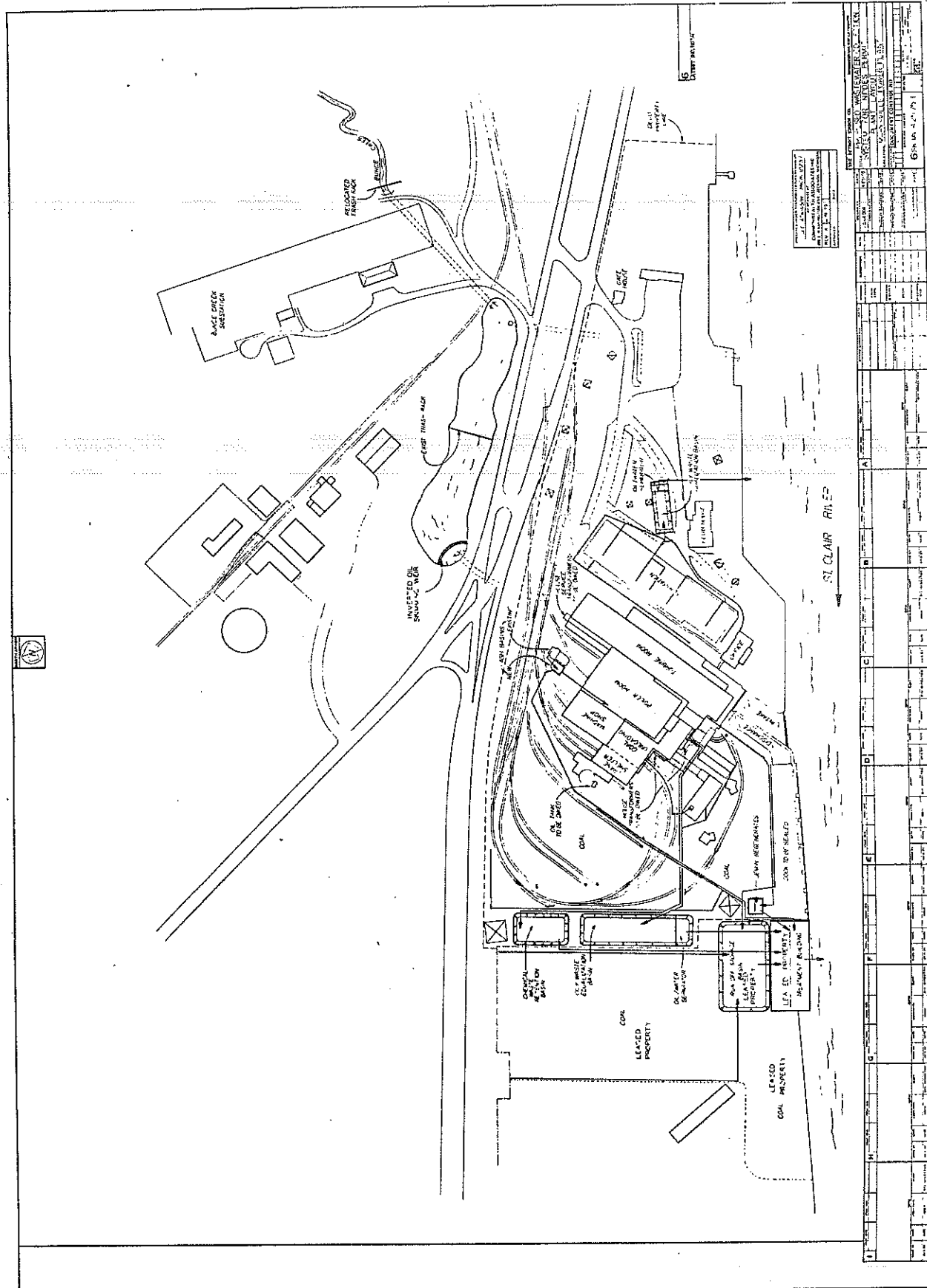
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FORM 1 GENERAL		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER FMID0418130983D			
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE <i>DETROIT EDISON CO</i>		GENERAL INSTRUCTIONS			
I. EPA I.D. NUMBER				<p>If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.</p>			
III. FACILITY NAME							
V. FACILITY MAILING ADDRESS							
VI. FACILITY LOCATION							
II. POLLUTANT CHARACTERISTICS				INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.			
SPECIFIC QUESTIONS		MARK 'X'		SPECIFIC QUESTIONS		MARK 'X'	
YES		NO		YES		NO	
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		X		F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
III. NAME OF FACILITY				MARYSVILLE POWER PLANT			
IV. FACILITY CONTACT				A. NAME & TITLE (last, first, & title) STERLING, M. DIRECTOR ENV AFF B. PHONE (area code & no.) 313 237 8618			
V. FACILITY MAILING ADDRESS				A. STREET OR P.O. BOX 32000 SECOND AVENUE B. CITY OR TOWN DETROIT C. STATE MI D. ZIP CODE 48226			
VI. FACILITY LOCATION				A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER 5301 GRATIOT BLVD B. COUNTY NAME ST CLAIR C. CITY OR TOWN MARYSVILLE D. STATE MI E. ZIP CODE 48040 F. COUNTY CODE (if known) 74147			

INUED FROM THE FRONT

IC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
(specify) 9 1 1 Electric Generating Station				(specify) 7			
C. THIRD				D. FOURTH			
(specify)				(specify)			

OPERATOR INFORMATION

A. NAME ETROIT EDISON COMPANY												B. Is the name listed in Item VIII-A also the owner? <input type="checkbox"/> YES <input type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.) FEDERAL M = PUBLIC (other than federal or state) STATE O = OTHER (specify) PRIVATE P Corporation										D. PHONE (area code & no.) 3 1 3 2 3 7 8 0 0 0			
E. STREET OR P.O. BOX 00 SECOND AVENUE													
F. CITY OR TOWN ETROIT								G. STATE MI		H. ZIP CODE 4 8 2 2 6		IX. INDIAN LAND Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water) M I 0 0 0 1 6 9 4										D. PSD (Air Emissions from Proposed Sources) 9 P									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
C. RCRA (Hazardous Wastes)										F. OTHER (specify)									

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

NATURE OF BUSINESS (provide a brief description)

Electric Generating Station

H

CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all comments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME & OFFICIAL TITLE (type or print) C. M. Heidel, Executive Vice President		B. SIGNATURE C. M. Heidel		C. DATE SIGNED 11-17-80	
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COMMENTS FOR OFFICIAL USE ONLY



<b>FORM</b> <b>3</b>	<b>EPA</b>	<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>HAZARDOUS WASTE PERMIT APPLICATION</b> Consolidated Permits Program <i>(This information is required under Section 3005 of RCRA.)</i>	<b>I. EPA I.D. NUMBER</b> <div style="border: 1px solid black; padding: 2px;">           F M I D 0 4 1 8 1 3 0 9 8 3 1         </div>
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**FOR OFFICIAL USE ONLY**

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

**II. FIRST OR REVISED APPLICATION**

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

**A. FIRST APPLICATION** (place an "X" below and provide the appropriate date)
☒ **1. EXISTING FACILITY** (See instructions for definition of "existing" facility. Complete item below.)

☐ **2. NEW FACILITY** (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

C	YR.	MO.	DAY
15	8	2	0
	73 74	75 76	77 78

YR.	MO.	DAY
73 74	75 76	77 78

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

**B. REVISED APPLICATION** (place an "X" below and complete Item I above)
☐ **1. FACILITY HAS INTERIM STATUS**
☐ **2. FACILITY HAS A RCRA PERMIT**
**III. PROCESSES - CODES AND DESIGN CAPACITIES**

**A. PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

**B. PROCESS DESIGN CAPACITY** - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>			<b>Treatment:</b>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
<b>Disposal:</b>					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
<b>UNIT OF MEASURE</b>	<b>UNIT OF MEASURE CODE</b>		<b>UNIT OF MEASURE</b>	<b>UNIT OF MEASURE CODE</b>	
GALLONS	G	LITERS PER DAY	ACRE-Feet	A	
LITERS	L	TONS PER HOUR	HECTARE-METER	F	
CUBIC YARDS	Y	METRIC TONS PER HOUR	ACRES	B	
CUBIC METERS	C	GALLONS PER HOUR	HECTARES	Q	
GALLONS PER DAY	U	LITERS PER HOUR			

**EXAMPLE FOR COMPLETING ITEM III** (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

<div style="display: flex; justify-content: space-between;"> <span>C</span> <span>DUP</span> <span>T/A/C 31</span> </div>									
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY		
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)			1. AMOUNT	2. UNIT OF MEASURE (enter code)		
X-1	S02	600	G	5					
X-2	T03	20	E	6					
1	S02	64,000	G	7					
2	S04	930,000	G	8					
3	T02	24,000	U	9					
4				10					

**II. PROCESSES (continued)**

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**V. DESCRIPTION OF HAZARDOUS WASTES**

**EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS .....	P	KILOGRAMS .....	K
TONS .....	T	METRIC TONS .....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if

have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

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EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W M I D 0 4 1 8 1 3 0 9 8 2 1										W 1 2 DUP 2 2 DUP									
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)										D. PROCESSES									
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))				
	23	24	25	26			27	28	29	30	31	32	33	34					
1	D	0	0	2	220	T	S	0	2	S	0	4	T	0	2				
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26																			

continued from the front.

V. DESCRIPTION OF HAZARDOUS WASTE

(continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

M I D 0 4 1 8 1 3 0 9 8 3 6

F. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

G. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

H. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4 2 5 5 3 7 0

LONGITUDE (degrees, minutes, & seconds)

0 8 2 2 2 1 3 8 0

I. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

X. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

C. M. Heidel, Executive  
Vice President

B. SIGNATURE

C. M. Heidel

C. DATE SIGNED

11-17-80

Y. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. M. Heidel

C. DATE SIGNED

11-17-80



<b>FORM 1</b> <b>GENERAL</b>	<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>GENERAL INFORMATION</b> Consolidated Permits Program <i>(Read the "General Instructions" before starting.)</i>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th colspan="10">PA I.D. NUMBER</th> </tr> <tr> <td>F</td><td>M</td><td>I</td><td>D</td><td>0</td><td>4</td><td>1</td><td>8</td><td>1</td><td>3</td> <td>T/A</td><td>C</td> </tr> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td> <td>11</td><td>12</td> </tr> <tr> <td colspan="10"></td> <td>D</td><td></td> </tr> </table>	PA I.D. NUMBER										F	M	I	D	0	4	1	8	1	3	T/A	C	1	2	3	4	5	6	7	8	9	10	11	12											D	
PA I.D. NUMBER																																																
F	M	I	D	0	4	1	8	1	3	T/A	C																																					
1	2	3	4	5	6	7	8	9	10	11	12																																					
										D																																						
<b>LABEL ITEMS</b> I. EPA I.D. NUMBER III. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION		PLEASE PLACE LABEL IN THIS SPACE	<b>GENERAL INSTRUCTIONS</b> If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.																																													

**II. POLLUTANT CHARACTERISTICS**

**INSTRUCTIONS:** Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production; inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

**III. NAME OF FACILITY**

C	1	SKIP	MARYSVILLE POWER PLANT	49
---	---	------	------------------------	----

**IV. FACILITY CONTACT**

A. NAME & TITLE (last, first, & title)				B. PHONE (area code & no.)			
C	2	STERLING, M. DIRECTOR ENV AFF		3	1	3	2
17	18		48	49	50	51	52

**V. FACILITY MAILING ADDRESS**

A. STREET OR P.O. BOX			
C	3	2000 SECOND AVENUE	48
19	20		49
B. CITY OR TOWN		C. STATE	D. ZIP CODE
C	4	DETROIT	MI 48226
19	20		

**VI. FACILITY LOCATION**

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
C	5	301 GRATIOT BLVD	48
19	20		49
B. COUNTY NAME		C. CITY OR TOWN	D. STATE
C	6	MARYSVILLE	MI
19	20		
E. ZIP CODE		F. COUNTY CODE (if known)	
C	7	48040	74
19	20		

CONTINUED FROM THE FRONT

SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
4 9 1 1 (specify)										7 (specify)									
Electric Generating Station																			
C. THIRD										D. FOURTH									
(specify)										(specify)									

I. OPERATOR INFORMATION

A. NAME										B. Is the name listed in item VIII-A also the owner?									
DETROIT EDISON COMPANY										<input type="checkbox"/> YES <input type="checkbox"/> NO									

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)									
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P = PRIVATE										P Corporation 3 1 3 2 3 7 8 0 0 0									

E. STREET OR P.O. BOX									
0 0 0 SECOND AVENUE									

F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND	
DETROIT										MI		4 8 2 2 6		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
M I 0 0 0 1 6 9 4										9 P									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
U										(specify)									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
R										(specify)									

MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show an outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

NATURE OF BUSINESS (provide a brief description)

Electric generating station

II. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME & OFFICIAL TITLE (type or print)										B. SIGNATURE										C. DATE SIGNED									
C. M. Heidel, Executive Vice President										C. M. Heidel										11-17-80									

COMMENTS FOR OFFICIAL USE ONLY

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**III. PROCESSES (continued)**

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

- A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS . . . . .	P	KILOGRAMS . . . . .	K
TONS . . . . .	T	METRIC TONS . . . . .	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY									
W M I D 0 4 1 8 1 3 0 9 8 1															W DUP 2 DUP									
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																								
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																				
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))												
1	D 0 0 2	220	T	S	0	2	S	0	4	T	0	2												
2																								
3																								
4																								
5																								
6																								
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Continued from the front.

**IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**

**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)															
S	F	M	I	D	0	4	1	8	1	3	0	9	8	T/A/C	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	

**V. FACILITY DRAWING**

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

**VI. PHOTOGRAPHS**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

**VII. FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes, & seconds)										LONGITUDE (degrees, minutes, & seconds)									
4	2	5	5	3	7					0	8	2	2	2	7	3	8		
55	56	57	58	59	60	61	62	63	64	72	73	74	75	76	77	78	79	80	81

**VIII. FACILITY OWNER**

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER										2. PHONE NO. (area code & no.)									
E																			
3. STREET OR P.O. BOX										4. CITY OR TOWN									
F										G									
5. ST.										6. ZIP CODE									
15 16										40 41 42 43 44 45 46 47 48 49									

**IX. OWNER CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type) C. M. Heidel, Executive Vice President	B. SIGNATURE C. M. Heidel	C. DATE SIGNED 11-17-80
--	------------------------------	----------------------------

**X. OPERATOR CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE C. M. Heidel	C. DATE SIGNED 11-17-80
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07-03-80

15319

16873 06 01

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## OVER-SIZED DOCUMENT TARGET

At this point in this file  
a large document,  
such as a map  
or  
engineering drawing  
occurred

...

This type of media is not compatible with this film format,  
which would require that the over-sized document be folded  
and filmed in multiple frames.

To enable the user to use this over-sized document  
as a single entity,  
it has been microfilmed on 35mm film.

ID Number MID0411 13098 Inst Name Marysville Power PlantPHASE ONE

Refer to Form No:	Interim Regulatory Requirements	Indicate by your initials:		Valid Permig Date?
		Yes	No	
1	T/S/D Facility? (If No, return to respondent.)	R.P.	___	___
3	Form 1 received?	R.P.	___	___
1	Form 3 received?	R.P.	___	___
1 & 3	Postmarked on or before November 19, 1980?	R.P.	___	___
3	Date of operation entered?	<del>R.P.</del>	R.P.	___
3	Date of operation on or before November 19, 1980?	<del>R.P.</del>	R.P.	___
Notif. record	Notifier?	S.T.	___	___
"	Notified on or before August 18, 1980?	S.T.	___	___
1	Form 1, XIII B signed?	R.P.	___	___
3	Form 3, IX B Signed?	R.P.	___	___

(If all ten items above are initialed in the Yes column, generate Interim Status Acknowledgement and indicate the trigger date here: \_\_\_\_\_)

PHASE TWO

1	Unsure if regulated or non-regulated?	___	___
3	New facility?	___	___
1 & 3	Core items missing? If Yes, indicate which items: Facility name___; location___; mail address___; operator info___; certification___; process info___; waste info___; owner___; sigs___.		

PHASE THREE

1 & 3	Non-core items missing? If Yes, indicate which items: Maps___; photos___; drawings___; lat/long___. Other observations and comments:
-------	--

Log out/Log in  
on reverse side.

1922

Received Date Stamp

(Stamp forms also)

1110041813098

ility Name Marysville Power Plant ☐ ACKNOWLEDGEMENT SENT

iewer Label INTERNAL CHECKLIST

e Review Started 5/10/78

1. Interim Regulatory Requirements

A. (1) FORM 1 MISSING ☐

(2) FORM 3 MISSING ☐

B. POSTMARK after NOVEMBER 19, 1980 ☐ Valid

C. (1) DATE of OPERATION MISSING ☐

(2) DATE of OPERATION after NOVEMBER 19, 1980 ☐

D. (1) NOTIFIED after AUGUST 18, 1980 ☐ Valid

(2) NONNOTIFIER ☐

E. (1) FORM 1, XIII B SIGNATURE MISSING ☐

(2) FORM 3, IX B SIGNATURE MISSING ☐

2. A. TSDF ☐

B. NONREGULATED ☒

C. UNSURE ☐

D. UNKNOWN FACILITY  
(missing name and address on Form 3) ☐

E. NEW FACILITY ☐

F. CORE ITEM(S) MISSING ☐

G. NONCORE ITEM(S) MISSING ☒

H. OTHER ☐

*photos inadequate  
map*

RECORD OF  
COMMUNICATION

☐ OTHER (SPECIFY)

(Record of) (checked above)

FROM:

DATE

TIME

SUBJECT

Facility I.D.# / Facility Name

SUMMARY OF COMMUNICATION

CONCLUSIONS, ACTION TAKEN OR REQUIRED

ADDITIONAL INFORMATION COPIES

CHECK IF ITEM  
MISSING

## ITEM NUMBER

II. Pollutant Characteristics ☐\*III. Name of Facility ☐IV. Facility Contact ☐

## V. Facility Mailing Address

A. Street or P.O. Box ☐B. City or Town ☐C. State ☐D. Zip Code ☐

## VI. Facility Location

\*A. Street, Route Number ☐B. County Name ☐\*C. City or Town ☐\*D. State ☐E. Zip Code ☐F. County Code (if known) ☐VII. SIC Codes (other than Process and Hazardous Waste codes) ☐

## VIII. Operator Information

\*A. Name ☐\*B. Is the name listed in VIII-A also the owner ☐C. Status of operator ☐D. Phone ☐\*E. Street or P.O. Box ☐\*F. City or Town ☐\*G. State ☐H. Zip Code ☐

IX. Indian Land ☐X. Existing Environmental Permits ☐XI. Map ☐XII. Nature of Business ☐

XIII. Certification

A. \*1. Name ☐2. Official Title ☐\*B. Signature ☐\*C. Date Signed ☐

Comments:

\*Form 1 is missing ☐

Reviewer's Initial \_\_\_\_\_



FORM 3 (EPA FORM 3510-3)

ITEM NUMBER

CHECK IF ITEM  
MISSING

II. First Application

\*1. Existing Facility Date (on or before  
November 19, 1980)

☐

OR

\*2. New Facility Date (after November 19, 1980)

☐

III. Processes

\*A. Process Code

☐

\*B. Process Design Capacity-Amount

\*1. Amount

☐

\*2. Unit of Measure

☐

IV. Description of Hazardous Wastes

\*A. EPA Hazardous Waste Number

☐

\*B. Estimated Annual Quantity

☐

\*C. Unit of Measure

☐

\*D. Processes

\*1. Process Codes

☐

\*2. Process Description (If no code is shown)

☐

V. Facility Drawing

☐

VI. Photographs

☐

VII. Facility Geographic Location Latitude

Latitude

☐

Longitude

☐

CHECK IF ITEM  
MISSING

## VIII. Facility Owner

- \*1. Name of Facility's Legal Owner
- 2. Phone
- \*3. Street or P.O. Box
- \*4. City or Town
- \*5. State
- 6. Zip Code

☐  
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☐  
☐

## IX. Owner Certification

- \*A. Name
- \*B. Signature
- \*C. Date Signed

☐  
☐  
☐

## X. Operator Certification

- \*A. Name
- \*B. Signature
- \*C. Date

☐  
☐  
☐

Comments:

\*Form 3 is missing

☐

# \_\_\_\_\_

Reviewer's Initial \_\_\_\_\_

REGION V

M.T.D. 041813098

5WMB

DATE: 2/12/82

RE: Installation Name Detroit Edison

Installation Address 2000 Second Ave. - Detroit, MI

EPA ID# See attached

FROM: Regulatory Analysis and Information Section

TO: Gene Meyer, Chief  
Technical Programs Section

ATTN: Joe Boyle

Attached for your review is a copy of Letter requesting  
that 9 facilities in Michigan be placed  
on inactive status

for the above-referenced facility.

Cover letter date 1/26/82

Rec'd in Region 2/12/82

Rec'd in RAIS 2/12/82

Action required \_\_\_\_\_

Reviewer's summary: Refer to RAIU for whatever  
action is needed to place these facilities' paperwork  
and data base info into "inactive status"  
I believe RAIU has a roster of facilities which  
want to get out of interim status  
"non-regulated" for now. J. Boyle 2/22/82

PLEASE RETURN THIS FORM ALONG WITH ALL RELATED MATERIAL TO  
DENISE BAKER



**Detroit  
Edison**

2000 Second Avenue  
Detroit, Michigan 48226  
(313) 237-8000

January 26, 1982

**RECEIVED**

**FEB 12 1982**

**WASTE MANAGEMENT BRANCH  
EPA, REGION V**

Mr. Joseph Boyle  
RCRA Activities  
P. O. Box 7861  
Chicago, IL 60680

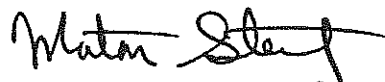
Dear Mr. Boyle:

The purpose of this letter is to request a change of status of the Detroit Edison Company's (the Company) treatment and storage permit applications under the Resource Conservation and Recovery Act (RCRA). The Company submitted requests for interim authorization under RCRA for nine power plants and one warehouse (the Warren Service Center, MI000722157) on November 18, 1980. Due to subsequent changes in RCRA regulations and interpretations, it appears that the activities at the power plants are exempted by rule. These provisions include the totally enclosed treatment exemption and the "fossil fuel exemption" 40 CFR 261.4(b)4, §288.6202 2(e). As a result, the Company requests that these nine applications (all except Warren Service Center) be placed in inactive status. I understand via our recent phone conversation that questions arise as to the status of power plant applications in light of the pending review of fly ash. Inactive status would assure a hiatus during the period of fly ash review and yet would provide you with information from submitted application forms. It would save the expense of reviewing applications for completeness and any audit functions. The Michigan Department of Natural Resources have concurred that the facilities do not require permits under the State Hazardous Waste Management Act (Act 64) at this time (see enclosed letter).

I have enclosed brief facility descriptions explaining process stream waste materials along with NPDES water use diagrams. These should clarify the Company interpretation by rule.

I ask that you place the following applications on inactive status until decisions are made regarding fly ash. If you have any questions or require clarification, please notify Dr. Paul Eisele of my staff (313 237-8618).

Sincerely,



Morton Sterling, Director  
Environmental Affairs Department

Enclosures

cc: EPA Audit Division

PJE/bjw

**RECEIVED**  
2/12/82

## Introduction

On November 19, 1980 the Detroit Edison Company submitted Treatment and Storage Permit application forms under the federal Resource Conservation and Recovery Act (RCRA) for ten facilities, nine power plant sites and 1 service center. Three process waste streams were considered and reported for the power plants as possible "hazardous wastes." These were demineralizer regenerant and air preheater wash water as corrosive wastes and chelated boiler cleaning solutions because some metals sometimes exceeded certain levels.

Shortly after these applications were submitted, further testing, rule clarifications and interpretive memos clarified facts that excluded these wastes as hazardous or exempted them from further regulation. Further testing proved all preheater wash water to be non hazardous. Clarifications on totally enclosed treatment and treatment in self supporting impervious structures rendered demineralizer discharges exempt from regulation. Both of these waste streams are discharged, following treatment if necessary, via NPDES discharges.

The utility waste exemption described in the so-called EPA "Dietrich memorandum" for RCRA purposes can exempt metal cleaning wastes from regulation. These wastes, generated through chelant cleanings of the boiler tubes, are burned in operating boilers and/or are co-disposed with ashes.

The following descriptions and diagrams characterize present operating conditions at power plants on a site specific basis. Only demineralizer and metal cleaning waste handling will be described. Of these two waste streams, metal cleaning wastes are produced intermittently, approximately 12 times per year, Company wide. The cleanings occur once every 18 months to 5 years per boiler. Since the wastes are generated intermittently and may vary from plant to plant and boiler to boiler, not all cleanings have been characterized.

### Belle River Power Plant - MID000718841 G, T, TSD, PA gmb

The Belle River Power Plant is a coal-fired two unit plant under construction. The plant is permitted to discharge metal cleaning wastes, demineralizer regenerate and condensate polisher regenerate under NPDES (see enclosed water diagram). Demineralizer and condensate polisher regenerates are neutralized in a totally enclosed treatment system prior to discharge. Metal cleaning is planned to be done periodically on the two boilers using ammoniated EDTA. The boilers would be cleaned individually with the waste stream routed directly to the operating boiler. The solution could be hazardous but it is unlikely since the boiler and associated equipment are not copper and the system would be new. The EDTA would be combusted and the metallic particulate matter would be removed with ash in the flue gas. This waste would thus be exempted under the RCRA rules as evidenced by the Dietrich letter.

### River Rouge Power Plant - MID000718379 G, T, TSD, PA

The River Rouge Power Plant is a multi-unit plant permitted to discharge both demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer regenerant is neutralized in a totally enclosed treatment system prior to discharge.

Metal cleaning is done periodically on the 2 operating boilers (1 unit is in economy reserve) using ammoniated EDTA. The boilers are cleaned individually with the waste stream routed directly to the operating boiler at a rate of 200 gpm. This solution could contain up to 2500 mg/l copper, 20 mg/l lead or 20 mg/l chromium based on reported analyses from similar boiler solutions.

This practice has been ongoing. This waste is exempted under the RCRA rules as evidenced by the Dietrich memo. Non-combustible metals are removed from the flue gas by the same equipment which is used to remove coal ash.

Conners Creek Power Plant - MID000809608 G, T, TSD no Part A

gmb

The Conners Creek Power Plant is a multi-unit plant permitted to discharge both demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer regenerant is neutralized in a totally enclosed treatment system.

Metal cleaning is done periodically on the 4 operating coal fired boilers (11 stoker fired boilers are on economy reserve and are not expected to require cleaning) using a chelant solution, ammoniated EDTA. Boilers are cleaned individually with the waste stream routed directly to an operating boiler for thermal treatment at a rate of 100 gallons per minute. This solution could contain up to 2500 mg/l copper, 20 mg/l lead and 20 mg/l chromium since these are older boilers, based on maximum analysis obtained from similar solutions. This practice has been ongoing. The chelant solution is combusted and the metallic particulate matter is removed with ash in the flue gas. This waste is thus exempted under the RCRA rules as evidenced by the Dietrich memo.

Trenton Channel Power Plant - MID000721571 G, T, TSD, PA

gmb

The Trenton Channel Power Plant is a multi-unit coal fired plant permitted to discharge both demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer regenerant is neutralized in a totally enclosed treatment system.

Metal cleaning is done periodically on the 5 existing boilers using a chelant solution, ammoniated EDTA. Boilers are cleaned individually and the waste stream is routed directly to an operating boiler at a rate of 240 gpm. This solution could contain up to 2500 mg/l copper, 20 mg/l lead or 20 mg/l chromium based on the maximum reported analyses of several cleaning solutions. This practice has been ongoing. The chelant solution is combusted and the metallic particulate matter removed with the other ash in the flue gas. This waste is thus exempted under the RCRA rules as evidenced by the Dietrich memo.

St. Clair Power Plant - MID000721548 G, T, TSD, PA

gmb

The St. Clair Power Plant is a multi-unit plant permitted to discharge both demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer regenerant is neutralized in a totally enclosed treatment system prior to discharge.

Metal cleaning is done periodically on the 6 coal fired boilers (the seventh boiler is on economy reserve) using a chelant solution, ammoniated EDTA. The boilers are cleaned individually with the waste stream routed directly to an operating boiler at a rate of 428 gpm. This solution could contain up to 2500 mg/l copper, 20 mg/l lead or 20 mg/l chromium based upon the maximum reported analyses of cleaning solutions. The EDTA is combusted and the metallic particulate matter removed with ash in the flue gas. This waste is thus exempted under the RCRA rules as evidenced by the Dietrich memo.

Harbor Beach Power Plant - MID000718445 G, T, TSD, PA

gmb  
The Harbor Beach Power Plant is a single unit plant permitted to discharge both demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer regenerant is neutralized in a totally enclosed treatment system prior to discharge.

Metal cleaning is done periodically on the one coal fired boiler using a chelant solution, ammoniated EDTA. Since there is only one boiler, the waste stream is routed to a tank truck and held until the unit is refired. The stream is then combusted at a rate of 86 gpm. This solution could contain up to 2500 mg/l copper, 20 mg/l lead or 20 mg/l chromium but it is unlikely since the boiler is newer. Since the chromium, copper and lead are removed and codisposed along with the ash in the flue gas, this waste stream is thus exempted under the RCRA rules as evidenced by the Dietrich memo.

Marysville Power Plant - MID041813098 G, T, TSD, PA

gmb  
The Marysville Power Plant is a multi-unit plant permitted to discharge both demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer regenerant is neutralized in a totally enclosed treatment system prior to discharge.

Metal cleaning is done periodically on the 4 operating coal fired boilers (6 stoker fired boilers are on economy reserve) using a chelant solution, ammoniated EDTA. The boilers are cleaned individually and the Company plans to route the waste stream directly to an operating boiler for thermal treatment at a rate of 63 gpm. This solution could contain up to 2500 mg/l copper, 20 mg/l lead or 20 mg/l chromium based upon the maximum reported concentration of analyzed solution. Since this a coal fired facility and the hazardous constituents would be removed with the plant's fly ash, this waste is exempted under the RCRA rules as evidenced by the Dietrich memo.

Greenwood Energy Center - MID000718452 G, T, TSD, PA

gmb  
The Greenwood Power Plant is an oil fired single unit plant which is permitted to discharge condensate polisher demineralizer regenerant and metal cleaning wastes under NPDES (see enclosed water use diagram). Demineralizer condensate polisher regenerant is neutralized in a self supporting impervious concrete tank prior to discharge to other wastewaters.

Metal cleaning is done periodically on the one boiler using a chelant solution, EDTA. Since the boiler is new, it is questionable whether the waste stream will exceed copper, chromium or lead limits. Cleanings are so rare that no cleaning waste was generated in the past year nor is any planned for the next 3 years. Company plans are to test the waste to determine if it is 'hazardous'. If it is 'hazardous', in-line lime treatment will be used to render it non-hazardous in a totally enclosed treatment system, and it will be either combusted or discharged via NPDES.

Monroe Power Plant - MID092175074 G, T, TSD, PA

gmb  
No Act 64 permit application was submitted for the multi-unit coal fired Monroe Power Plant. Discharge of both the demineralizer regenerant condensate polisher and metal cleaning wastes (acid cleaning) are permitted under NPDES (see enclosed



water use diagram). Demineralizer and condensate polisher waste streams are neutralized in totally enclosed treatment systems. Previous tests on the acid metal cleaning wastes have indicated the waste is not hazardous.

### Conclusion

Based on the site specific information above, demineralizer regenerant condensate polisher waste at all facilities is "non-hazardous waste" after totally enclosed treatment. Combustion and/or co-disposal of ammoniated EDTA is exempt at all power plants except the Greenwood Power Plant which is oil fired.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 13 1981

OFFICE OF WATER  
AND WASTE MANAGEMENT

Mr. Paul Emler, Jr.  
Chairman  
Utility Solid Waste Activities  
Group  
Suite 700  
1111 Nineteenth Street, N.W.  
Washington, D.C. 20036

Dear Mr. Emler:

This is a response to your letter of October 10, 1980 to Administrator Costle, regarding the recent Solid Waste Disposal Act Amendments of 1980 and their relation to the electric utility industry. In your letter and its accompanying document, you discussed the specific amendments which address fossil fuel combustion wastes, and suggested interpretive language which EPA should adopt in carrying out the mandate of the amendments. You requested a meeting with our staff to make us more fully aware of the solid waste management practices of the electric utility industry, and to discuss the effect of the amendments on the utility solid waste study which EPA is currently conducting.

I appreciated the opportunity to meet with you, in your capacity as chairman of the Utility Solid Waste Activities Group (USWAG), on November 21 to discuss your concerns. I am taking this occasion to share with you the most recent EPA thinking on the exclusion from our hazardous waste management regulations of waste generated by the combustion of fossil fuels, and to confirm certain agreements which were reached during our meeting. The language contained in this letter should provide you and your constituents with an adequate interpretation of the fossil fuel combustion waste exclusion in Section 261.4(b)(4) of our regulations. This letter is also being circulated to appropriate Agency personnel, such as our Regional Directors of Enforcement, for their information and use. We intend to issue in the Federal Register an official Regulations Interpretation Memorandum reflecting the policies articulated in this letter.

In our May 19, 1980 hazardous waste management regulations, we published an exclusion from Subtitle C regulation for those fossil fuel combustion wastes which were the subject of then pending Congressional amendments. The language of that exclusion in §261.4(b)(4) of our May 19 regulations is identical to pertinent language of Section 7 of the Solid Waste Disposal Act

Amendments of 1980 (P.L. 96-482) which was enacted on October 21, 1980 and which mandates that exclusion. Specifically, the exclusion language of our regulations provides that the following ~~solid wastes are not hazardous wastes:~~

"Fly ash waste, bottom ash waste, slag waste, and flue gas emission control waste generated primarily from the combustion of coal or other fossil fuels."

#### Residues from the Combustion of Fuel Mixtures

The first point which you raise in your letter and your "Proposed RIM Language" is the interpretation of the term "primarily" used in this exclusion language. EPA believes that Congress intended the term "primarily" to mean that the fossil fuel is the predominant fuel in the fuel mix, i.e., more than 50 percent of the fuel mix. (See Congressional Record, February 20, 1980, p. H1103, remarks of Congressman Horton and p. H1102, remarks of Congressman Beville.) Therefore, EPA is interpreting the exclusion of §261.4(b)(4) to include fly ash, bottom ash, boiler slag and flue gas emission control wastes (hereinafter referred to as "combustion wastes") that are generated by the combustion of mixtures of fossil fuels and alternative fuels, provided that fossil fuels make up at least 50 percent of the fuel mix.

This interpretation begs the question of whether the exclusion also extends to combustion wastes that result from the burning of mixtures of fossil fuels and hazardous wastes. We have limited data which indicates that spent solvents listed in §261.31 of our regulations, certain distillation residues listed in §261.32, waste oils that may be hazardous wastes by virtue of characteristics or the mixture rule, and other hazardous wastes are often burned as supplemental fuels--sometimes in proportionally small amounts but sometimes in significant amounts (comprising 10 percent or more of the fuel mix ratio)--particularly in industrial boilers but sometimes in utility boilers. EPA is concerned about the human health and environmental effect of the burning of these hazardous wastes: both the effect of emissions into the atmosphere and the effect of combustion residuals that would be contained in the fly ash, bottom ash, boiler slag and flue gas emission control wastes.

We intend to address the first of these concerns in our future development of special requirements applicable to hazardous wastes that are beneficially used or legitimately recycled. In §261.6 of our May 19, 1980 regulations, we currently exempt from regulatory coverage hazardous wastes that are beneficially used or legitimately recycled, except that, where these wastes are listed as hazardous wastes or sludges, their storage or transportation prior to use or recycle is subject to our

regulations. We clearly explained in the preamble to Part 261 of our May 19 regulations that we fully intend to eventually regulate the use and recycling of hazardous wastes and, in doing so, would probably, in most cases, develop special requirements that provide adequate protection of human health and the environment without unwarranted discouragement of resource conservation. Consequently, although the burning of hazardous waste as a fuel (a beneficial use assuming that the waste has a positive fuel value) is not now subject to our regulations (except as noted above) it may well be subject to our regulation in the future.

Our second concern with combustion of fuel mixtures is the one at focus in this interpretation. It must first be noted that we do not intend for §261.6 to provide an exemption from regulation for combustion wastes resulting from the burning of hazardous wastes in combination with fossil fuels; it only provides an exemption for the actual burning of hazardous wastes for recovery of fuel value. Thus, if these combustion wastes are exempted from our regulation, such exemption must be found through interpretation of §261.4(b)(4). Secondly, we note that although the pertinent language in Section 7 of the Solid Waste Disposal Act Amendments of 1980 and the related legislative history on this matter speak of allowing the burning of alternative fuel without precisely defining or delineating the types of alternative fuel, the only examples of alternative fuels used in the legislative history are refuse derived fuels. Therefore, a literal reading of the legislative history might enable us to interpret the exclusion to include combustion wastes resulting from the burning of fossil fuels and other fuels, including hazardous wastes. However, since each of these legislative comments was made in the context of refuse derived fuels or other non-hazardous alternate fuels, we do not believe the Congressional intent compels us to make such an interpretation if we have reason to believe that such combustion wastes are hazardous.

Presently, we have little data on whether or to what extent combustion wastes are "contaminated" by the burning of fossil fuel/hazardous waste mixtures. The data we do have (e.g., burning of waste oils) suggests that the hazardous waste could contribute toxic heavy metal contaminants to such combustion wastes. When coal is the primary fuel, the amount of resulting contamination is probably in amounts that are not significantly different than the metals that would be contributed by the fossil fuel component of the fuel mixture. This may not be the case with oil and gas, where huge volumes of waste are not available to provide a dilution effect. We suspect that the other hazardous constituents of the hazardous wastes that typically would be burned as a fuel are either thermally destroyed or are emitted in the flue gas (and therefore are part of our first concern as discussed above). If

these data and this presumption are true, then combustion wastes resulting from the burning of coal/hazardous waste mixtures should not be significantly different in composition than combustion wastes generated by the burning of coal alone. Because the Congress has seen fit to exclude the latter wastes from Subtitle C, pending more study, we feel compelled to provide the same exclusion to the former wastes.

Accordingly, we will interpret the exclusion of §261.4(b)(4) to include fly ash, bottom ash, boiler slag and flue gas emission control wastes generated in the combustion of coal/hazardous waste mixtures provided that coal makes up more than 50 percent of the fuel mixture.

We offer this interpretation with great reluctance and with the clear understanding it is subject to change, if and when data indicate that combustion wastes are significantly contaminated by the burning of hazardous wastes as fuel. We also offer this interpretation with the understanding, as discussed at our meeting of November 21, that the utility industry will work with us over the next several months to improve our data on this matter. We believe it is essential that we make a more informed judgement and possible reconsideration of our interpretation of the exclusion as soon as possible and before completion of our longer-term study of utility waste which is proceeding. Accordingly, we would like you to provide to us all available data on the following questions by August 1, 1981:

1. What types of hazardous wastes are commonly burned as fuels in utility boilers? In what quantity? In what ratio to fossil fuels? How often? What is their BTU content?
2. Does the burning of these wastes contribute hazardous constituents (see Appendix VIII of Part 261 of our regulations) to any of the combustion wastes? If so, what constituents, and in what amounts? How does the composition of combustion wastes change when hazardous wastes are burned?

#### Co-disposal and Co-treatment

The second issue raised in your letter was whether the exclusion extends to wastes produced in conjunction with the burning of fossil fuels which are co-disposed or co-treated with fly ash, bottom ash, boiler slag and flue gas emission control wastes. As examples of such wastes, you specifically mention boiler cleaning solutions, boiler blowdown, demineralizer regenerant, pyrites, cooling tower blowdown, or any "wastes of power plant origin whose co-treatment with fly ash, bottom ash, slag and flue gas emission control sludges is regulated under State-or-EPA-sanctioned management or treatment plans."

The legislative history on this matter clearly indicates that the Congress intended that these other wastes be exempted from Subtitle C regulation provided that they are mixed with and co-disposed or co-treated with the combustion wastes and ~~further provided that "there is no evidence of any substantial environmental danger from these mixtures."~~ (See Congressional Record, February 20, 1980, p. H 1102, remarks of Congressman Bevill; also see remarks of Congressman Rahall, Congressional Record, February 20, 1980, p. H1104.) .

We have very little data on the composition, character and quantity of these other associated wastes (those cited above), but the data we do have suggest that they are generated in small quantities relative to combustion wastes, at least when coal is the fuel, and that they primarily contain the same heavy metal contaminants as the combustion wastes, although they may have a significantly different pH than the combustion wastes. These limited data therefore suggest that, when these other wastes are mixed with and co-disposed or co-treated with the much larger quantities of combustion wastes, their composition and character are "masked" by the composition and character of the combustion wastes; that is, they do not significantly alter the hazardous character, if any, of the combustion wastes.

Given this information base and given the absence of definitive information indicating that these other wastes do pose a "substantial danger" to human health or the environment, we believe it is appropriate, in the light of Congressional intent, to interpret the §261.4(b)(4) exclusion to include other wastes that are generated in conjunction with the burning of fossil fuels and mixed with and co-disposed or co-treated with fly ash, bottom ash, boiler slag and flue gas emission control wastes.

We offer this interpretation with some reluctance because it is made in the absence of definitive information about the hazardous properties of these other wastes or their mixtures with combustion wastes. We therefore believe it is imperative that we proceed to collect all available data on this matter within the next several months and reconsider this interpretation when these data are assessed. Toward that end and consistent with the discussion at our meeting of November 21, we are asking that you assist us in collecting these data. Specifically, we ask that you collect and submit by August 1, 1981, any available data on the following questions:

1. What are the "other" wastes which are commonly mixed with and co-disposed or co-treated with fly ash, bottom ash, boiler slag or flue gas emission control wastes? What are their physical (e.g., sludge or liquid) and chemical properties? Are they hazardous wastes in accordance with Part 261?

2. What are the co-disposal or co-treatment methods employed?
3. How often are these wastes generated? In what quantities are they generated? ~~Are they commonly treated in any way before being co-disposed?~~
4. Does the industry possess any data on the environmental effects of co-disposing of these wastes? Groundwater monitoring data? What are the results?

The interpretation on other associated wastes provided in this letter is limited to wastes that are generated in conjunction with the burning of fossil fuels. We do not intend to exempt hazardous wastes that are generated by activities that are not directly associated with fossil fuel combustion, steam generation or water cooling processes. Thus, for example, the §261.4(b)(4) exclusion does not cover pesticides or herbicide wastes; spent solvents, waste oils or other wastes that might be generated in construction or maintenance activities typically carried out at utility and industrial plants; or any of the commercial chemicals listed in §261.33 which are discarded or intended to be discarded and therefore are hazardous wastes. Further, the exclusion does not cover any of the hazardous wastes listed in §§261.31 or 261.32 of our regulations. None of these listed wastes were mentioned in your letter or our discussions.

The interpretation on other wastes is also limited to wastes that traditionally have been and which actually are mixed with and co-disposed or co-treated with combustion wastes. If any of these other wastes (e.g., boiler cleaning solutions, boiler blowdown, demineralizer regenerant, pyrites and cooling tower blowdown) are segregated and disposed of or treated separately from combustion wastes and they are hazardous wastes, they are not covered by the exclusion. In the same vein, the exclusion does not cover other wastes where there are no combustion wastes (or relatively small amounts of combustion wastes) with which they might be mixed and co-disposed or co-treated--a situation which might prevail where natural gas or oil is the principal fossil fuel being used. Therefore, this interpretation of the exclusion applies only where coal is the primary fuel. We feel this is a legitimate interpretation of Congressional intent, wherein the argument of little potential environmental hazard, primarily due to the dilution factor, is clearly based upon co-disposal or co-treatment with the huge volumes of wastes generated during coal combustion.



EPA Utility Waste Study

The groups of questions raised above bring us to the final subject which you address concerning the study of utility solid waste management which EPA is conducting. We agree that the study, as currently being conducted, does not focus on the matters discussed in this letter. We would, however, like to address these matters and include them in our report to Congress, to the extent possible. To accomplish this, we plan to meet in the very near future with our contractor, Arthur D. Little, Inc., to discuss what studies may need to be carried out in addition to their currently planned activities under the contract. The inputs of your organization could be quite useful in this effort. It may be impossible, however, to modify our present study to include a detailed investigation of all of the issues discussed above.

Notwithstanding, we would like to address the matters discussed in this letter within a shorter time frame--during the next six months. Based on our meeting of November 21, it is my understanding that the utility industry, working closely with EPA, is willing to develop data on the questions put forth above. We agreed that, as a first step, USWAG will prepare a study outline designed to obtain these data. EPA staff and industry representatives designated by your organization will then mutually review the information needs. The data collection effort will then follow. Finally, data and analyses will be presented to EPA for review. This will enable us to reconsider the interpretation provided in this letter and make any changes deemed necessary. Therefore, I would appreciate it if you would designate a technical representative as USWAG's contact person for this coordinated data collection effort.

In the meantime, and pending completion of this effort, EPA will interpret 40 CFR §261.4(b)(4) to mean that the following solid wastes are not hazardous wastes:

- (a) Fly ash, bottom ash, boiler slag and flue gas emission control wastes resulting from (1) the combustion solely of coal, oil, or natural gas, (2) the combustion of any mixture of these fossil fuels, or (3) the combustion of any mixture of coal and other fuels, up to a 50 percent mixture of such other fuels.
- (b) Wastes produced in conjunction with the combustion of fossil fuels, which are necessarily associated with the production of energy, and which traditionally have been, and which actually are, mixed with and co-disposed or co-treated with fly ash, bottom ash, boiler slag, or flue gas emission control wastes from coal combustion.

This provision includes, but is not limited to, the following wastes:

- (1) boiler cleaning solutions,
- ~~(2) boiler blowdown,~~
- (3) demineralizer regenerant,
- (4) pyrites, and
- (5) cooling tower blowdown.

I am hopeful that our future research activities together will prove fruitful and that these issues can be rapidly resolved. I have designated Ms. Penelope Hansen of my staff as the EPA point of contact for this effort. You may reach her at (202) 755-9206.

Sincerely yours,



Gary N. Dietrich  
Associate Deputy Assistant Administrator  
for Solid Waste

NOTES



2021-22

DATE	
TIME	
BY	
REMARKS	
SIGNATURE	

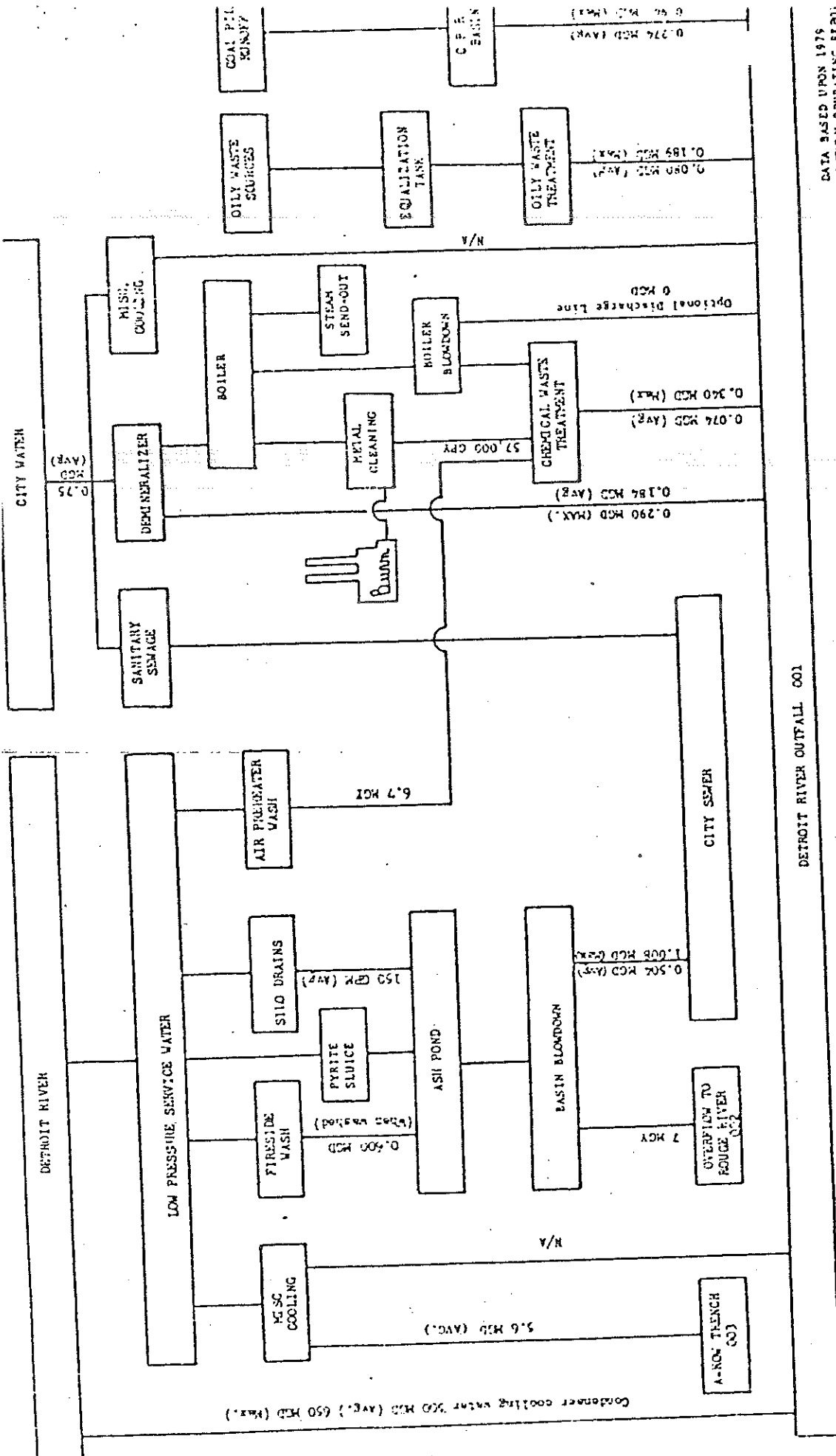
THE DETROIT EDISON CO.

INVESTMENT PLAN

## WATER USE DIAGRAM

6501258-0040

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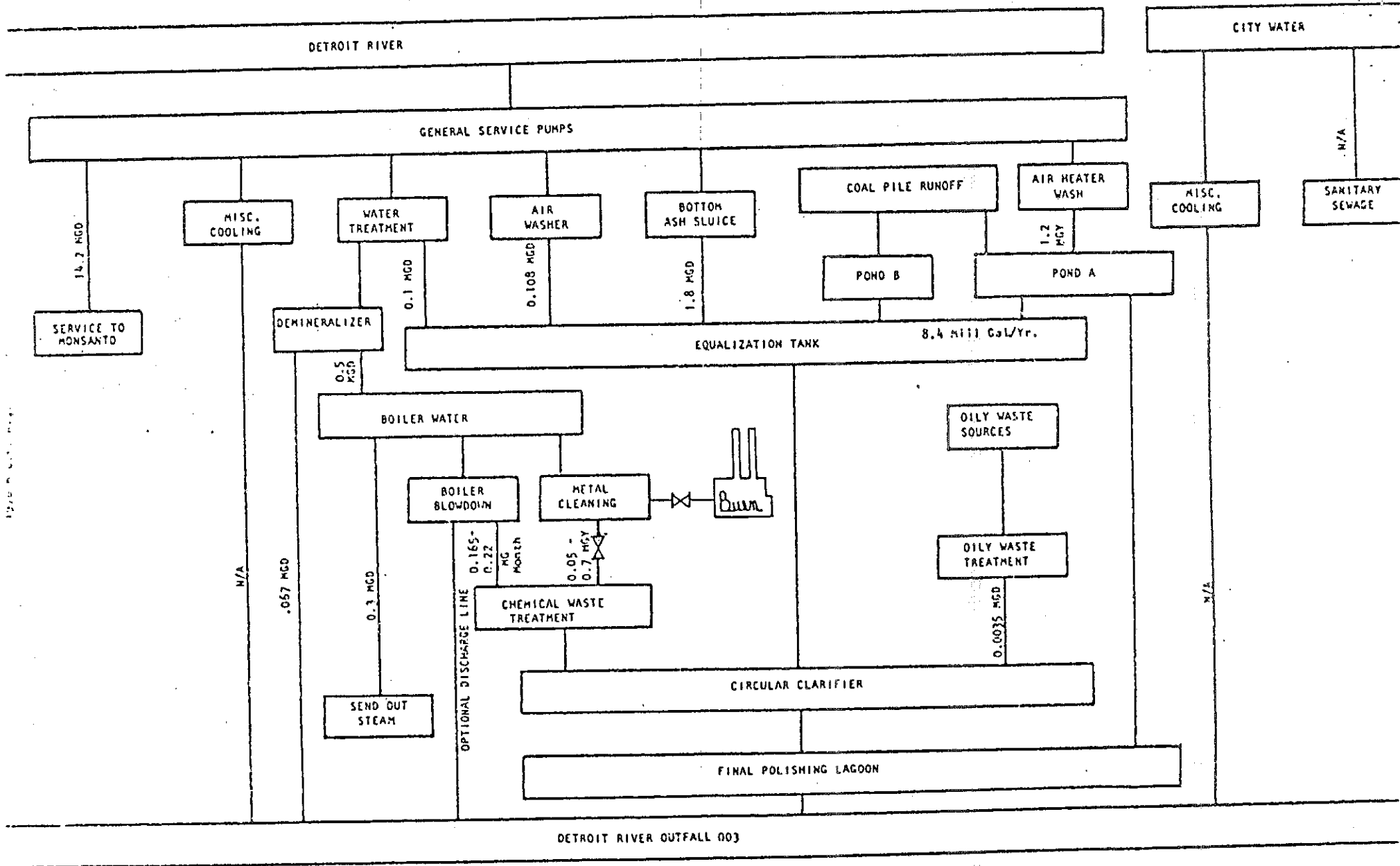


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MONTHLY OPERATING RECORD

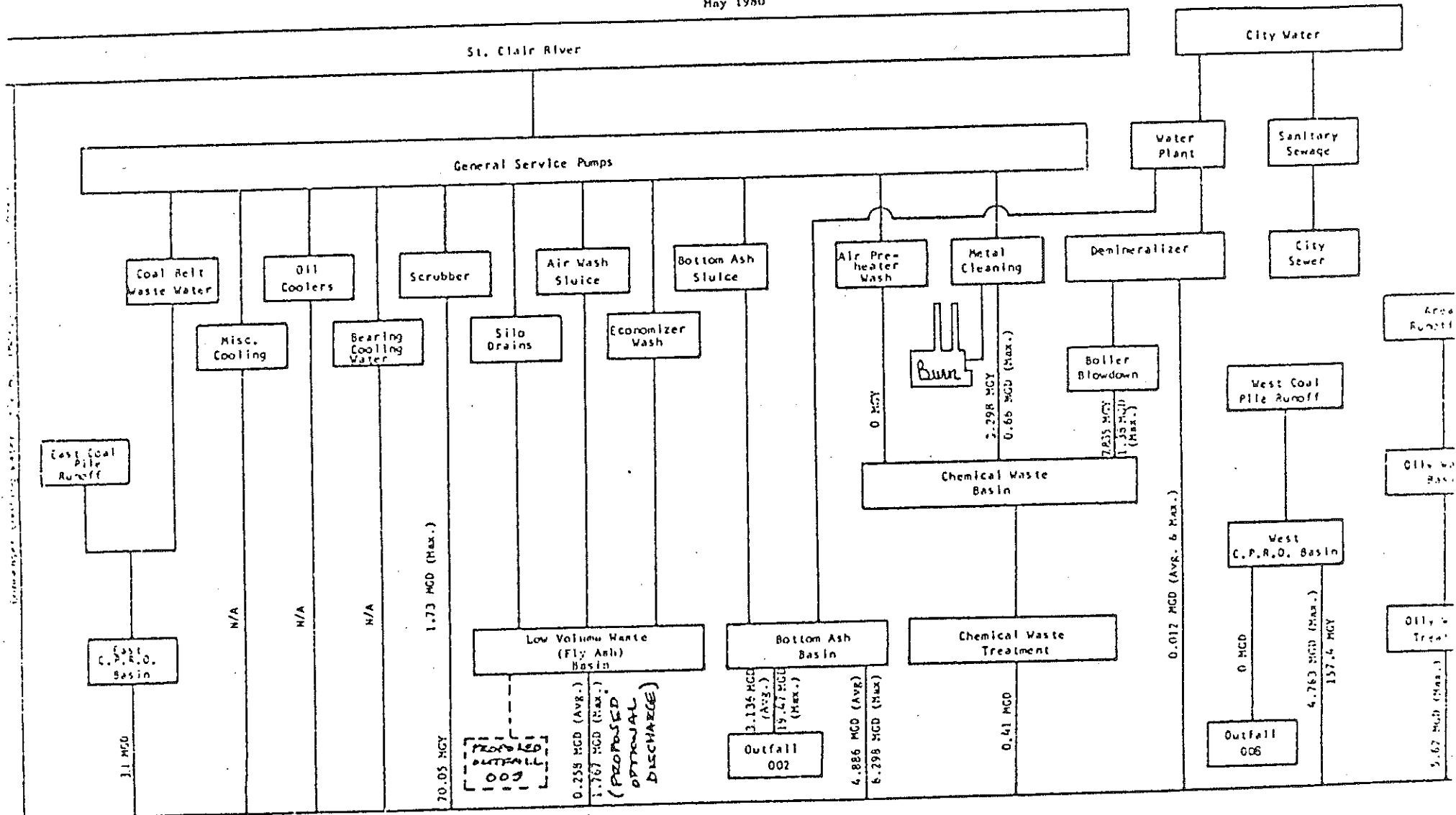
*River Rouge P.P.*



**TRENTON CHANNEL POWER PLANT**  
 Water Usage  
 August 1979



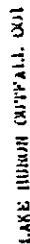
ST. CLAIR POWER PLANT  
Water Usage  
May 1980



ST. CLAIR RIVER OUTFALL 001

DATA BASED UPON  
1979 MONTHLY OPERATING REPORT

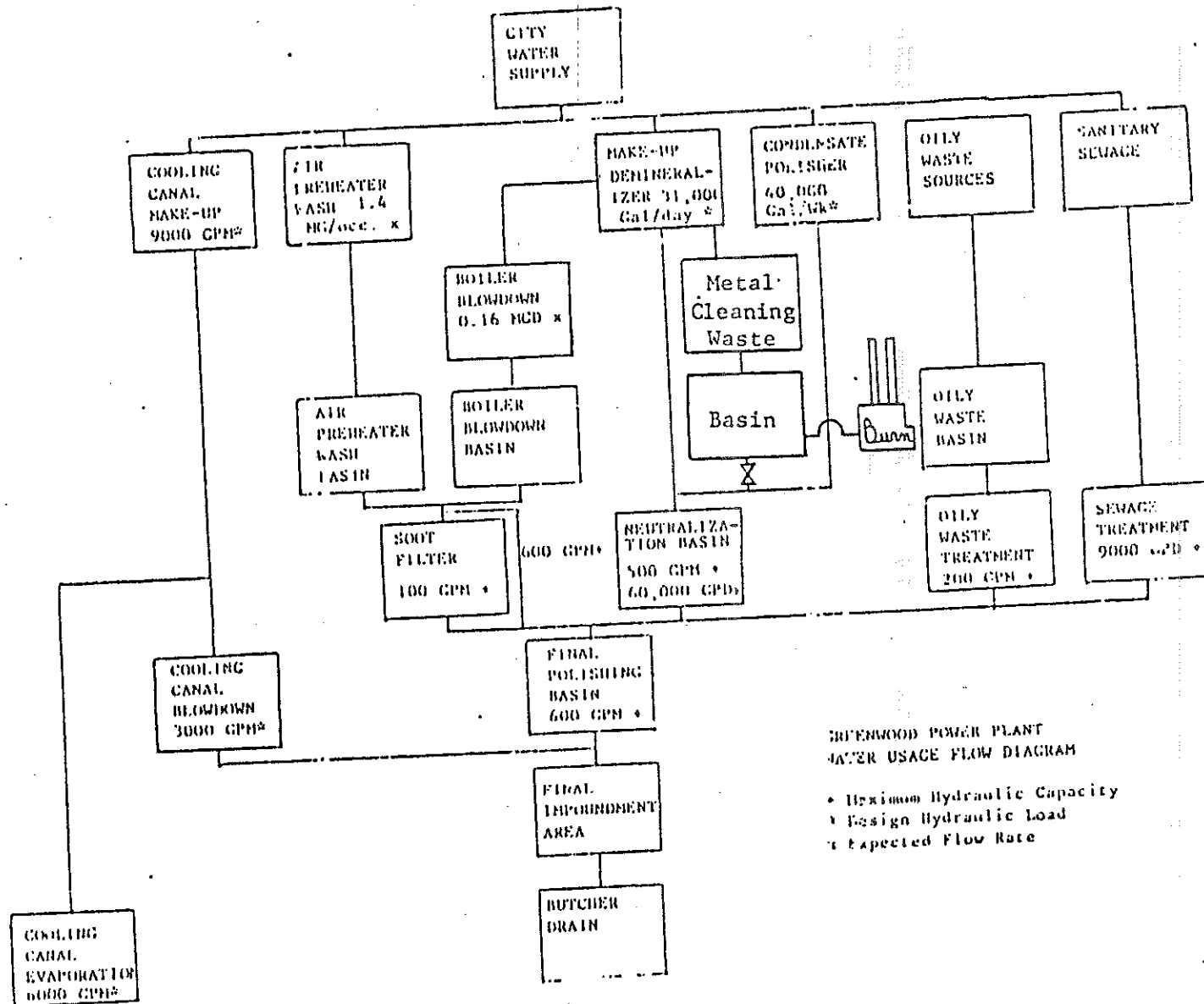
March 1979







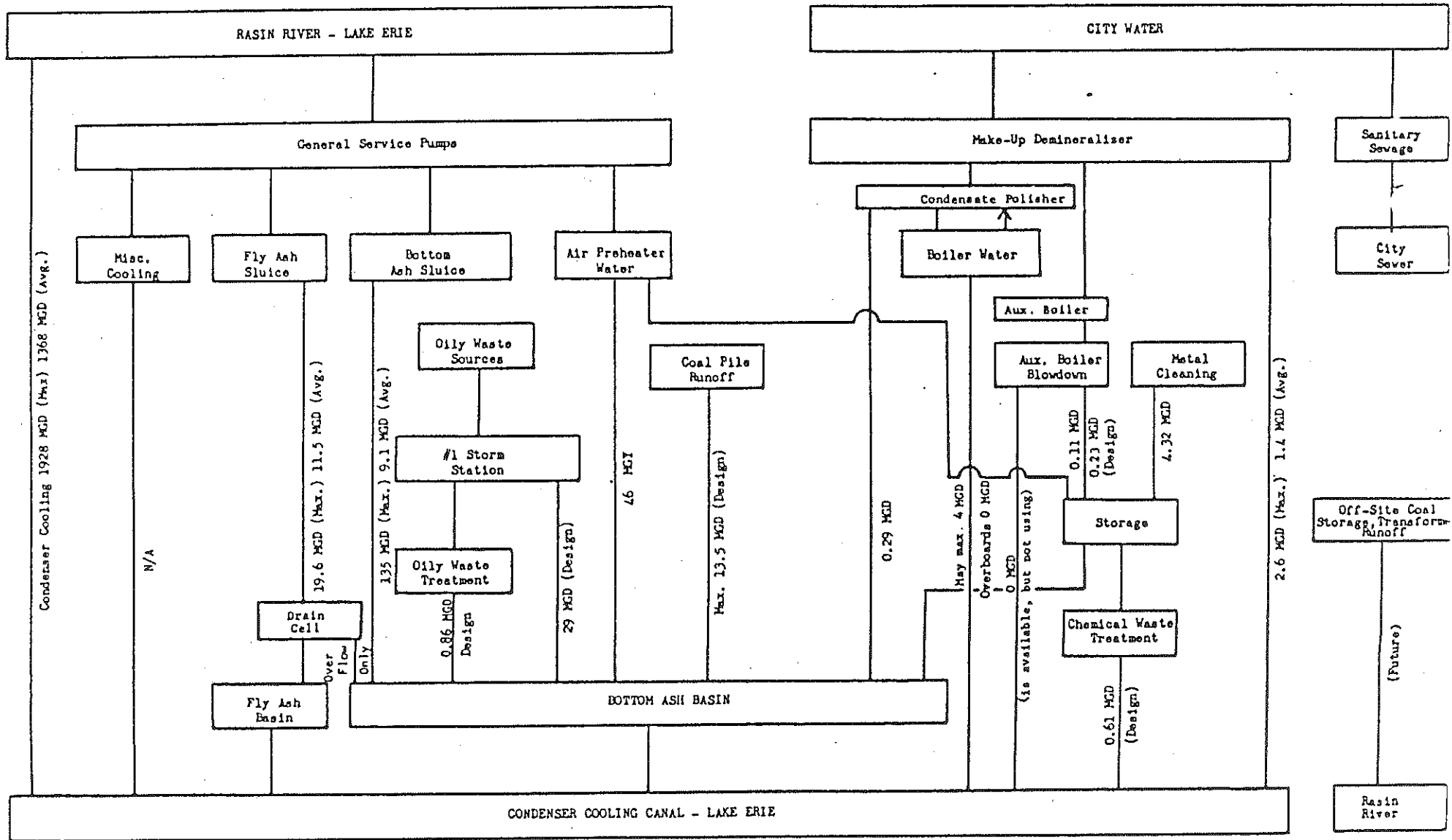
# GREENWOOD POWER PLANT WATER USAGE FLOW DIAGRAM May, 1979



GREENWOOD POWER PLANT  
WATER USAGE FLOW DIAGRAM

- \* Maximum Hydraulic Capacity
- x Design Hydraulic Load
- x Expected Flow Rate

**MONROE POWER PLANT**  
 Water Usage  
 August 1979







UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V

111 West Jackson Blvd.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:  
RCRA ACTIVITIES

17 NOV 1982

Mr. Morton Sterling, Director of Environmental Affairs  
Detroit Edison  
2000 Second Avenue  
Detroit, Michigan 48226

RE: Withdrawal of Part A (Exempted Waste)

FACILITY NAME: Detroit Edison

USEPA ID NO.: MID 000 721 548, MID 000 721 571, MID 000 809 608,  
MID 000 718 379, MID 000 718 841, MID 041 813 098,  
MID 092 175 074 (See Attached List)

Dear Mr. Sterling:

This is to acknowledge that the United States Environmental Protection Agency (USEPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of January 26, 1982, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility only treats, stores or disposes of waste listed in 40 CFR Part 261.4 (enclosed), which are exempt from regulations at this time.

It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you still must comply with all applicable State and local requirements.

You will retain your USEPA Identification number if you notified as a generator or transporter of hazardous waste.

Please contact the Technical, Permits and Compliance Section at (312) 352-2197 for assistance if you have any questions. Please refer to "Withdrawal of Part A (Exempted Wastes)," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

Enclosure

cc: Mr. C. M. Heidel, Executive Vice President  
MDNR

Facilities - Detroit Edison  
(Exempted Waste)

St. Clair Power Plant	MID 000 721 548
Trenton Channel Power Plant	MID 000 721 571
Conners Creek Power Plant	MID 000 809 608
River Rouge Power Plant	MID 000 718 379
Belle River Power Plant	MID 000 718 841
Marysville Power Plant	MID 041 813 098
Monroe Power Plant	MID 092 175 074

Morton Sterling, Director of Environmental Affairs  
Detroit Edison  
2000 Second Avenue  
Detroit, MI 48226

RCRA ACTIVITIES

RE: Withdrawal of Part A (Exempted Waste)  
FACILITY NAME: Detroit Edison  
USEPA ID NO.: See Attached list

Dear

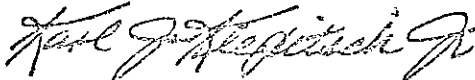
This is to acknowledge that the United States Environmental Protection Agency (USEPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of January 26, 1982, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility only treats, stores or disposes of waste listed in 40 CFR Part 261.4 (enclosed), which are exempt from regulations at this time.

It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you still must comply with all applicable State and local requirements.

You will retain your USEPA Identification number if you notified as a generator or transporter of hazardous waste.

Please contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Withdrawal of Part A (Exempted Wastes)," in all telephone contacts and correspondence on this matter.

Sincerely yours,



Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

Enclosure

cc: MDNR

C.M. Heidel Executive Vice President

JK  
DH  
10/1/84

Facilities - Detroit Edison  
(Exempted Waste)

St. Clair Power Plant	MID 000 721 548
Trenton Channel Power Plant	MID 000 721 571
Connors Creek Power Plant	MID 000 809 608
River Rouge Power Plant	MID 000 718 379
Belle River Power Plant	MID 000 718 871
Marysville Power Plant	MID 041 813 098
Marble Power Plant	MID 092 175 074



#1051

INSPECTION AND ENFORCEMENT REVIEW/STATUS

ID # MID 041813098  
FACILITY NAME Detroit Edison Marysville Power Plant  
LOCATION 301 Grafton Blvd.  
Marysville, Mi.

COMPLIANCE STATUS: IN OUT  
VIOLATION CLASS: (I) II (III)  
(G) T (TSD)  
REVIEWER: dlw  
DATE: 12/8/82

INSPECTION REVIEW

ACTION ITEM	STRT DATE	END DATE	RPT COMP	STAT CODE	RESP AGCY	RESP PERS	COMM	FREE FLDS	TYPE INSP	PART AGCY	LINK
1	8/09/82	8/09/82	8/09/82	5	5	dlw	* N/A	N/A	N	—	

ENFORCEMENT ACTIONS

ACTION ITEM	DATE ISUD	DATE DUE	DATE RECD	STAT CODE	STAT DATE	RESP AGCY	RESP PERS	COMM	FREE FLDS	PLTY ASSD	PLTY CLTD	DTHR COM	DTHR COMP	LINK
3	10/8/82	11/19/82	—	X	10/8/82	S	dlw	*	N/A	N/A	N/A	N/A	N/A	

COMMENTS:

\* ~~Warning letter sent 10/08/82~~



DES  
4-18-83  
SOG  
code 0

Follow up. Long  
1/1

#1442

RCRA Inspection Report

EPA Identification Number: MI D 0 4 1 8 1 3 0 9 8

Installation Name: Detroit Edison Co. Marysville, Pwr Plt

Location Address: 301 Gratiot

City: Marysville State: MI 48040

Date of inspection: 2/9/83 Time of inspection (from) 0930 (to) 1030

Person(s) interviewed	Title	Telephone
<u>Gordon Usitalo</u>	<u>Associate Eng.</u>	<u>(313) 364-6253</u>
<u>Catherine Whiting</u>	<u>Associate Eng.</u>	<u>(313) 897-0179</u>

Inspector(s)	Agency/Title	Telephone
<u>Larry A. Buchan</u>	<u>MDNR/HWD / Water Quality Spec.</u>	<u>(313) 3683335</u>

Installation Activity (mark only one box)

Inspection Form(s)

- |   |      |
|---|------|
| <input checked="" type="checkbox"/> Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation | A    |
| <input checked="" type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation)                        | A    |
| <input checked="" type="checkbox"/> Generation and Transportation   | B, C |
| <input checked="" type="checkbox"/> Generation only   | B    |
| <input checked="" type="checkbox"/> Transportation only   | C    |

*Facility is managing waste as a small quantity gen.*

cc: K. Burda

EPA

J. Bohunsky

**Detroit  
Edison**

2000 Second Avenue  
Detroit, Michigan 48226  
(313) 237-8000

Bill #1442 pg 71/7  
**RECEIVED** WEL

FEB 3 1983

WATER QUALITY DIV.  
DIST. I

February 1, 1983

Mr. Roy E. Schrameck  
Michigan Department of Natural Resources  
9311 Groh Road  
Grosse Ile, Michigan 48138

Dear Mr. Schrameck:

In your letter of December 6, 1982, you indicated dissatisfaction with the Company's response on November 19, 1982 to certain alleged deficiencies in the RCRA and Act 64 compliance program at the Marysville Power Plant. These alleged deficiencies were first brought to the Company's attention in a letter dated October 8, 1982 following a facility inspection on August 9, 1982. After reviewing your continuing concerns regarding the Marysville Power Plant program, we wish to respond to your letter of December 6, 1982 as follows.

Enclosed you will find an updated copy of the Best Management Practices Program for the Marysville Power Plant. You will note that the program has been modified to respond to your first three concerns.

With regard to your fourth concern, the "list of emergency equipment at the facility", we have a substantial difference of opinion as to the requirements of 40 CFR 265.52(e) of RCRA. This difference of opinion centers on the definition of "facility" as it is used in RCRA. At 40 CFR 260.10, "facility" is defined as "all contiguous land, and structures, and improvements on the land, used for treating, storing, or disposing of hazardous waste (emphasis added)." It is our position that only that portion of the plant which is used to store hazardous waste is the "facility" under that definition and, therefore, only that emergency equipment associated with the Hazardous Storage Area need be included in the list required by 40 CFR 265.52(e). Further, because the Marysville Power Plant is a "small quantity generator" in accordance with 40 CFR 261.5(a) based on its actual operating experience, it is in fact exempt from 40 CFR 265 pursuant to 40 CFR 261.5(b).

With regard to your final concern, the use of a manifest in accordance with 40 CFR 262.20 and Rule 299.6806 of Act 64 for the movement of hazardous waste from Marysville Power Plant, we must once again point out that based on the record, the Marysville Power Plant is a "small

cc: Ken Burda (3)

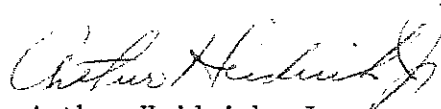
Chuck  
Bill

Mr. Roy E. Schrameck  
February 1, 1983  
Page 2

quantity generator" and, therefore, not subject to the manifesting provisions of either RCRA (pursuant to 40 CFR 261.5(b)) or Act 64 (pursuant to R 299.6104(f) and R 299.6203(2)(b) or (c) in light of R 299.6806 application only to "managed hazardous waste").

If you have any further questions regarding this matter, please contact me on (313) 237-8618.

Sincerely,

A handwritten signature in cursive script, appearing to read "Arthur Heidrich, Jr.", written in dark ink.

Arthur Heidrich, Jr.  
Acting Administrator  
Water & Land Use Programs

AH/bjw

cc: J. Bohunsky  
A. Howard

Enclosure

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER  
CARL T. JOHNSON  
E.M. LAITALA  
HILARY F. SNELL  
HARRY H. WHITELEY  
JOAN L. WOLFE  
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director  
Water Quality Division  
9311 Groh Road  
Grosse Ile, Michigan 48138

STEVEN T. MASON BUILDING  
BOX 30028  
LANSING, MI 48909

EPA

#10514ES  
11/13/82

MI D041213098

December 6, 1982

(TSB, 6)

CERTIFIED MAIL

Detroit Edison  
2000 Second Avenue  
Detroit, Michigan 48226

Attention: Joseph Cazeno, Jr.  
Administrative Specialist  
Water Quality  
Environmental Affairs Department

RECEIVED  
DEC 10 1982  
ACT 63

Dear Mr. Cazeno:

Thank you for your November 19, 1982 response to my letter of August 9, 1982 regarding RCRA deficiencies at the Marysville Power Plant. I have reviewed the material you sent me and have the following comments:

1. There is some confusion in my mind whether or not the BMP pages you sent me all pertain to the Marysville Power Plant. The Table of Contents refers to an Appendix D which concerns hazardous materials practices at the Monroe Power Plant. Also, page 1 mentions a Table 1 listing hazardous materials which may be found at the St. Clair Power Plant. I would appreciate your confirming whether or not these pages actually pertain to Marysville BMP.
2. On page 4, under spill notification, the telephone number listed for the State of Michigan (1-517-373-7660) is not the appropriate number to call. The 24 hour Pollution Emergency Alerting System (PEAS) number (1-800-292-4706) should be substituted.
3. On page 7, Mr. Michael Bennet is listed as the Primary Emergency Coordinator. There is a handwritten note in the margin, however, which says "Art--I'm going to update w/Gordie's name." It is unclear whether or not this information is up to date.



Mr. Joseph Cazeno  
December 7, 1982  
Page 2

4. Your letter asserts that the BMP includes the location, description and capability of emergency equipment located at the hazardous waste storage area. Please note that 265.52(e) pertains to a list of emergency equipment at the facility (not just the storage area) and must include the location, the physical description, and a brief outline of the capabilities of each item on the list. The only items mentioned on page 7 of the BMP are a telephone and a fire extinguisher, both near the storage area. This does not appear to satisfy either the letter or the intent of 265.52(e) for such a list. Item 9 under E, Other Emergency Procedures, deals with arrangements to have emergency equipment clean and fit before continued operation after clean up of a spill. It appears that this procedure applies to more than 1 telephone and 1 fire extinguisher. I do not consider your response to have corrected that deficiency.
5. Finally, you have indicated that it has been company policy to use a Waste Movement form for transporting wastes to the Warren Service Center. I am confident that you did not intend to imply that it has been company policy to violate RCRA and Act 64, but that is exactly what that policy seems to be doing, not in the use of the waste movement form, but in the failure to use a manifest. The revised waste movement form you submitted resembles a manifest somewhat more closely than the original but it does not qualify as a substitute. It lacks the following elements required by 40 CFR 262.21:

- mailing address, telephone number, and EPA ID number of the generator
- the name and EPA ID number of each transporter
- name and address of the designated facility
- the required certification in 262.21(b)

Depending on how it is used, the form may violate 262.22 and 262.23 as well.

In addition, the use of movement forms in lieu of manifests violates Rule R299.806 of Act 64 which requires the use of a manifest form issued or approved by the department (The Department of Natural Resources). A copy of same must be submitted to the department postmarked no later than 10 days after the month of shipment.

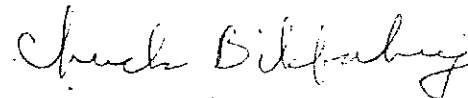
Mr. Joseph Cazen  
December 7, 1982  
Page 3

I trust this information will enable you to get the Marysville Power Plant and other facilities with the same problem into compliance. Please respond in writing by January 14, 1983 describing the actions taken. Until then, please do not hesitate to call this office or the office of Hazardous Waste Management with any questions.

Sincerely,

WATER QUALITY DIVISION

Roy E. Schrameck, P.E.  
District Engineer



By: Chuck Bikfalvy  
Water Quality Specialist

RES:CB/sc

cc: Al Howard, OHWM



EPA

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER  
CARL T. JOHNSON  
E.M. LAITALA  
HILARY F. SNELL  
HARRY H. WHITELEY  
JOAN L. WOLFE  
CHARLES G. YOUNGLOVE

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DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

Water Quality Division  
9311 Groh Road  
Grosse Ile, Michigan 48138

STEVENS T. MASON BUILDING  
BOX 30028  
LANSING, MI 48909

#1051

October 8, 1982

M. Sterling  
Director Environmental Affairs  
Detroit Edison  
2000 Second Avenue  
Detroit, Michigan 48206

On August 9, 1982, I conducted an inspection of the Marysville Power Plant for compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976 as amended. A copy of my report is enclosed for your use and distribution to appropriate facility personnel.

The inspection revealed the following deficiencies:

1. The inspection schedule did not identify the types of problems to be looked for during inspections, as required by 265.15(b)(3).
2. There was no inspection log or summary as required by 265.15(d).
3. The contingency plan did not include a list of emergency equipment available at the site, including the location, physical description and capabilities of each item, as required by 265.52(e).
4. One drum of hazardous waste was being stored open, with a funnel in the bung hole, while filling operations were not being performed. This is not in compliance with 265.173(a).
5. Containers were not being inspected weekly as required by 265.174.
6. Hazardous wastes shipped from the facility to the Warren Service Center were not manifested. This is a violation of Part 262 Subpart B.

RECEIVED

OCT 18 1982

ACT 64



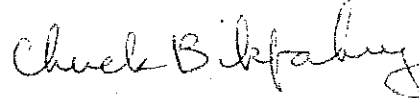
Mr. M. Sterling  
October 8, 1982  
Page 2

Please respond in writing by November 19, 1982, detailing actions taken to correct the deficiencies identified above. In the meantime, please do not hesitate to call me at (313) 675-0860 if you should have any comments or questions pertaining to your hazardous waste program.

Sincerely,

WATER QUALITY DIVISION

Roy E. Schrameck, P.E.  
District Engineer

A handwritten signature in cursive script that reads "Chuck Bikfalvy".

By: Chuck Bikfalvy  
Water Quality Specialist

RES:CB/sc

Enclosure

cc: Al Howard, OHWM (2)  
files

# RCRA Inspection Report

EPA Identification Number: M I D 0 4 1 8 1 3 0 9 8

Installation Name: DETROIT EDISON MARYSVILLE POWER PLANT

Location Address: 301 GRATIOT BLVD

City: MARYSVILLE State: MICH

Date of inspection: 8/9/82 Time of inspection (from) 9:30 (to) 11:45

Person(s) interviewed	Title	Telephone
<u>ART RICE</u>	<u>ASST SUPERINTENDENT</u>	<u>(313) 564-6253 x 172-21</u>
<u>MAUREEN LARSON</u>	<u>OPERATIONS ENG.</u>	<u>(313) 364-6253 x 172-21</u>
<u>BILL HORN</u>	<u>ASSISTANT ENGINEER</u>	<u>(313) 364-9046</u>
	<u>MATERIALS SUPERVISOR</u>	<u>OR 364-6253</u>

Inspector(s)	Agency/Title	Telephone
<u>C. BIKFALVY</u>	<u>M DNR WATER QUAL SPEC.</u>	<u>(313) 675-0860</u>

Installation Activity (mark only one box) Inspection Form(s)

- |   |      |
|---|------|
| <input checked="" type="checkbox"/> Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation | A    |
| <input type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation)                                   | A    |
| <input type="checkbox"/> Generation and Transportation  | B, C |
| <input type="checkbox"/> Generation only  | B    |
| <input type="checkbox"/> Transportation only  | C    |

RECEIVED  
OCT 18 1982  
DET 01

# INSPECTION FORM A

## Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)      Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

### Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

- Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.  
S01 - STORE WASTE IN CONTAINERS, BUT DO NOT KEEP FOR OVER 90 DAYS
- Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.  
S04 - DO NOT STORE HAZARDOUS WASTE IN SURFACE IMPOUNDMENTS  
T02 - DO NOT TREAT HAZARDOUS WASTE IN SURFACE IMPOUNDMENTS (4-82A)

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	<input checked="" type="checkbox"/>			N/A
b. Facility expansion?	<input checked="" type="checkbox"/>			N/A
c. Change of owner or operator?	<input checked="" type="checkbox"/>			N/A
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<input checked="" type="checkbox"/>			BY RESEARCH DEPT. IN DETROIT
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<input checked="" type="checkbox"/>			
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<input checked="" type="checkbox"/>			
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	<input checked="" type="checkbox"/>			
or				
b. i. Artificial or natural barrier around facility?	<input checked="" type="checkbox"/>			
and				
ii. Controlled entry?	<input checked="" type="checkbox"/>			
c. Danger sign(s) at entrance?				
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<input checked="" type="checkbox"/>			

\*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	✓			ONCE PER SHIFT BY OPERATORS, ONCE A WEEK BY ART OR MAURED
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?			✓	NA - HAVE NONE
ii. safety and emergency equipment?	✓			MONTHLY
iii. security devices?	✓			
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?			✓	NA
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?			✓	COULD NOT LOCATE THIS TYPE OF INFORMATION
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?		✓		NOT WRITTEN DOWN BUT IS A PRACTICE
d. Are areas subject to spills inspected daily when in use?	✓			
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?		✓		RESULTS OF INSPECTIONS REPORTED ORALLY OR VIA WORK ORDER IF MALFUNCTION NOTED
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?			✓	
ii. the name of the inspector?			✓	
iii. a notation of the observations made?			✓	
iv. the date and nature of any repairs or remedial actions?			✓	
5. Do personnel training records include: 265.16				
a. Job titles?	✓			
b. Job descriptions?	✓			

	YES	NO	NI	Remarks
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Did facility personnel receive the required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17			<input checked="" type="checkbox"/>	NA - NOT IGNITABLE OR REACTIVE.
a. Special handling?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<del>DIFFERENT WASTE</del>
b. No smoking signs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	STORED IN SEPARATE CONTAINERS
c. Separation and protection from ignition sources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation  
of Facility: 265.31

Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

YES NO NI Remarks

✓

2. If required, does the facility  
have the following equipment: 265.32

a. Internal communications or  
alarm systems?

✓

b. Telephone or 2-way radios  
at the scene of operations?

✓

c. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

✓

Indicate the volume of water and/or foam available for fire control:

CAN MAINTAIN 100 PSI IN HEADER WITH EVERY VALVE  
IN PLANT OPEN

3. Testing and Maintenance of  
Emergency Equipment: 265.33

a. Has the owner or operator  
established testing and  
maintenance procedures  
for emergency equipment?

✓

b. Is emergency equipment  
maintained in operable  
condition?

✓

4. Has owner or operator provided  
immediate access to internal  
alarms? (if needed) 265.34

✓

5. Is there adequate aisle space  
for unobstructed movement?

✓

6. Has the owner or operator attempted  
to make arrangements with local  
authorities in case of an emergency  
at the facility?

✓

C-1

THE SUBJECT IS ADDRESSED  
IN THE BEST MANAGEMENT  
PRACTICES MANUAL,  
BUT THE CONCLUSION IS  
THAT THE NATURE OF  
HAZARDOUS WASTES DO  
4/82-A  
NOT REQUIRE ITS FIRE  
NEED. DOES VISIT ONCE A YEAR



Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

✓

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

✓

ADDRESSED IN BAP,  
ALSO CALL LIST IN  
CONTINGENCY PLAN

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

✓

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

✓

DISCUSSED IN VARIOUS  
PLACES IN PLAN ~~AND~~,  
~~BUT NOT~~  
COMPILED IN SUCH  
A LIST

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

EVACUATION IS MENTIONED  
BUT NOT DESCRIBED,  
PROCEDURE WAS DESCRIBED  
TO ME ORALLY

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

✓

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Y/N - NO OCCURRENCE

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71			✓	
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	—	CO. DOES NOT RECIEVE WASTE FROM OUTSIDE THE FACILITY
b. Are records of past shipments retained for 3 years?	✓	—	—	
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	—	—	✓	NA
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.			✓	NA
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	—	—	—	
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	✓	—	—	
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	—	—	✓	KEPT IN ONE'S AREA ONLY
***iii. A map or diagram of each cell or disposal area				

\*\*\* only applies to disposal facilities

	YES	NO	NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	_____	_____	_____	_____
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	✓	_____	_____	KEPT IN RESEARCH DEPT. IN DETROIT
v. Reports detailing all incidents that required implementation of the Contingency Plan?	_____	_____	✓	NA - NO INCIDENTS
vi. All closure and post closure costs as applicable?	_____	_____	✓	NA - NO CLOSURE
4. Availability of Records 265.74				
Are all facility records required under 40 CFR Part 265 available for inspection?	✓	_____	_____	_____
5.**Unmanifested Waste Reports 265.76				
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?	_____	_____	✓	NA
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.	_____	_____	_____	_____

\*\* Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	ONE IS OPEN WITH FUNNEL IN BACKHOLE
5. Are containers inspected weekly for leaks and defects.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NA
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NA
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NA

## Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.				13, all out 132 (NON-HAZAROUS)
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				HAZARDOUS WASTES SHIPPED TO WARREN SERVICE CENTER HAVE COMPANYS OWN MOVEMENT FORMS, USE OWN TRUCKS
a. Manifest document number?	<input checked="" type="checkbox"/>			
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>			
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>			
g. Required certification?	<input checked="" type="checkbox"/>			
h. Required signatures?	<input checked="" type="checkbox"/>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.				0
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.				NA

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IN DETROIT ENGINEERING RESEARCH DEPT

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				





Place  
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Here

U.S. EPA Region V

RCRA Activities

Waste Management Division

P. O. Box A3587

Chicago, IL 60690

CITY

STATE

ZIP

Attn: Biennial Report

This site is exempt from the requirement to file the 1989 Hazardous Waste Report because:

- the site was not a RCRA Large Quantity Generator in 1989,

AND

- the site did not treat, store, or dispose of RCRA hazardous wastes on site in units subject to RCRA permitting requirements in 1989.

It is expected that this site will remain exempt from the requirement to file the Hazardous Waste Report:

Check one:

☒ For 1989 only

☐ Permanently

☐ Other (Explain: \_\_\_\_\_)

*gen 2*

*BAM  
304-92*

EPA ID

M I D 0 4 1 8 1 3 0 9 8

Site Name

Detroit Edison Co. Marysville Power Plant

Site Location Address

301 Gratiot Boulevard

Site Location Address

Marysville, MI 48040

Contact Name:

David Saint-Onge



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

*Detroit Edison  
301 Gratiot Ave  
Maryville MI 48040  
Attn: Dave Hawwood*

REPLY TO THE ATTENTION OF:

RCRA ACTIVITIES

AUG 25 1987

RE: EPA ID #: MID041813098

In response to your request of 6-25-87 the following information

has been updated:

*Installation Contact  
Installation Mailing Address*

If you have questions, please contact Sharon Kiddon at (312) 886-6173.

Sincerely,

*Arthur S. Kawatachi*

Arthur S. Kawatachi  
Information Unit  
Program Management Section

cc: State Agency  
File



United States Environmental Protection Agency  
Washington, DC 20460  
**Notification of Hazardous Waste**

87.10284

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law. (Section 3010 of the Resource Conservation and Recovery Act)

**For Official Use Only**

Comments	
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Installation's EPA ID Number	Approved	Date Received (month, day, year)
102	17A	1
103	17B	2
104	17C	3
105	17D	4
106	17E	5
107	17F	6
108	17G	7
109	17H	8
110	17I	9
111	17J	10
112	17K	11
113	17L	12
114	17M	13
115	17N	14
116	17O	15
117	17P	16
118	17Q	17
119	17R	18
120	17S	19
121	17T	20
122	17U	21
123	17V	22
124	17W	23
125	17X	24
126	17Y	25
127	17Z	26
128	17AA	27
129	17AB	28
130	17AC	29
131	17AD	30
132	17AE	31
133	17AF	32
134	17AG	33
135	17AH	34
136	17AI	35
137	17AJ	36
138	17AK	37
139	17AL	38
140	17AM	39
141	17AN	40
142	17AO	41
143	17AP	42
144	17AQ	43
145	17AR	44
146	17AS	45
147	17AT	46
148	17AU	47
149	17AV	48
150	17AW	49
151	17AX	50
152	17AY	51
153	17AZ	52
154	17BA	53
155	17BB	54
156	17BC	55
157	17BD	56
158	17BE	57
159	17BF	58
160	17BG	59
161	17BH	60
162	17BI	61
163	17BJ	62
164	17BK	63
165	17BL	64
166	17BM	65
167	17BN	66
168	17BO	67
169	17BP	68
170	17BQ	69
171	17BR	70
172	17BS	71
173	17BT	72
174	17BU	73
175	17BV	74
176	17BW	75
177	17BX	76
178	17BY	77
179	17BZ	78
180	17CA	79
181	17CB	80
182	17CC	81
183	17CD	82
184	17CE	83
185	17CF	84
186	17CG	85
187	17CH	86
188	17CI	87
189	17CJ	88
190	17CK	89
191	17CL	90
192	17CM	91
193	17CN	92
194	17CO	93
195	17CP	94
196	17CQ	95
197	17CR	96
198	17CS	97
199	17CT	98
200	17CU	99
201	17CV	100
202	17CW	101
203	17CX	102
204	17CY	103
205	17CZ	104
206	17DA	105
207	17DB	106
208	17DC	107
209	17DD	108
210	17DE	109
211	17DF	110
212	17DG	111
213	17DH	112
214	17DI	113
215	17DJ	114
216	17DK	115
217	17DL	116
218	17DM	117
219	17DN	118
220	17DO	119
221	17DP	120
222	17DQ	121
223	17DR	122
224	17DS	123
225	17DT	124
226	17DU	125
227	17DV	126
228	17DW	127
229	17DX	128
230	17DY	129
231	17DZ	130
232	17EA	131
233	17EB	132
234	17EC	133
235	17ED	134
236	17EE	135
237	17EF	136
238	17EG	137
239	17EH	138
240	17EI	139
241	17EJ	140
242	17EK	141
243	17EL	142
244	17EM	143
245	17EN	144
246	17EO	145
247	17EP	146
248	17EQ	147
249	17ER	148
250	17ES	149
251	17ET	150
252	17EU	151
253	17EV	152
254	17EW	153
255	17EX	154
256	17EY	155
257	17EZ	156
258	17FA	157
259	17FB	158
260	17FC	159
261	17FD	160
262	17FE	161
263	17FF	162
264	17FG	163
265	17FH	164
266	17FI	165
267	17FJ	166
268	17FK	167
269	17FL	168
270	17FM	169
271	17FN	170
272	17FO	171
273	17FP	172
274	17FQ	173
275	17FR	174
276	17FS	175
277	17FT	176
278	17FU	177
279	17FV	178
280	17FW	179
281	17FX	180
282	17FY	181
283	17FZ	182
284	17GA	183
285	17GB	184
286	17GC	185
287	17GD	186
288	17GE	187
289	17GF	188
290	17GG	189
291	17GH	190
292	17GI	191
293	17GJ	192
294	17GK	193
295	17GL	194
296	17GM	195
297	17GN	196
298	17GO	197
299	17GP	198
300	17GQ	199
301	17GR	200
302	17GS	201
303	17GT	202
304	17GU	203
305	17GV	204
306	17GW	205
307	17GX	206
308	17GY	207
309	17GZ	208
310	17HA	209
311	17HB	210
312	17HC	211
313	17HD	212
314	17HE	213
315	17HF	214
316	17HG	215
317	17HH	216
318	17HI	217
319	17HJ	218
320	17HK	219
321	17HL	220
322	17HM	221
323	17HN	222
324	17HO	223
325	17HP	224
326	17HQ	225
327	17HR	226
328	17HS	227
329	17HT	228
330	17HU	229
331	17HV	230
332	17HW	231
333	17HX	232
334	17HY	233
335	17HZ	234
336	17IA	235
337	17IB	236
338	17IC	237
339	17ID	238
340	17IE	239
341	17IF	240
342	17IG	241
343	17IH	242
344	17II	243
345	17IJ	244
346	17IK	245
347	17IL	246
348	17IM	247
349	17IN	248
350	17IO	249
351	17IP	250
352	17IQ	251
353	17IR	252
354	17IS	253
355	17IT	254
356	17IU	255
357	17IV	256
358	17IW	257
359	17IX	258
360	17IY	259
361	17IZ	260
362	17JA	261
363	17JB	262
364	17JC	263
365	17JD	264
366	17JE	265
367	17JF	266
368	17JG	267
369	17JH	268
370	17JI	269
371	17JJ	270
372	17JK	271
373	17JL	272
374	17JM	273
375	17JN	274
376	17JO	275
377	17JP	276
378	17JQ	277
379	17JR	278
380	17JS	279
381	17JT	280
382	17JU	281
383	17JV	282
384	17JW	283
385	17JX	284
386	17JY	285
387	17JZ	286
388	17KA	287
389	17KB	288
390	17KC	289
391	17KD	290
392	17KE	291
393	17KF	292
394	17KG	293
395	17KH	294
396	17KI	295
397	17KJ	296
398	17KK	297
399	17KL	298
400	17KM	299
401	17KN	300
402	17KO	301
403	17KP	302
404	17KQ	303
405	17KR	304
406	17KS	305
407	17KT	306
408	17KU	307
409	17KV	308
410	17KW	309
411	17KX	310
412	17KY	311
413	17KZ	312
414	17LA	313
415	17LB	314
416	17LC	315
417	17LD	316
418	17LE	317
419	17LF	318
420	17LG	319
421	17LH	320
422	17LI	321
423	17LJ	322
424	17LK	323
425	17LL	324
426	17LM	325
427	17LN	326
428	17LO	327
429	17LP	328
430	17LQ	329
431	17LR	330
432	17LS	331
433	17LT	332
434	17LU	333
435	17LV	334
436	17LW	335
437	17LX	336
438	17LY	337
439	17LZ	338
440	17MA	339
441	17MB	340
442	17MC	341
443	17MD	342
444	17ME	343
445	17MF	344
446	17MG	345
447	17MH	346
448	17MI	347
449	17MJ	348
450	17MK	349
451	17ML	350
452	17MN	351
453	17MO	352
454	17MP	353
455	17MQ	354
456	17MR	355
457	17MS	356
458	17MT	357
459	17MU	358
460	17MV	359
461	17MW	360
462	17MX	361
463	17MY	362
464	17MZ	363
465	17NA	364
466	17NB	365
467	17NC	366
468	17ND	367
469	17NE	368
470	17NF	369
471	17NG	370
472	17NH	371
473	17NI	372
474	17NJ	373
475	17NK	374
476	17NL	375
477	17NM	376
478	17NO	377
479	17NP	378
480	17NQ	379
481	17NR	380
482	17NS	381
483	17NT	382
484	17NU	383
485	17NV	384
486	17NW	385
487	17NX	386
488	17NY	387
489	17NZ	388
490	17OA	389
491	17OB	390
492	17OC	391
493	17OD	392
494	17OE	393
495	17OF	394
496	17OG	395
497	17OH	396
498	17OI	397
499	17OJ	398
500	17OK	399
501	17OL	400
502	17OM	401
503	17ON	402



ID For Official Use Only										
C									T/A	C
W										

# X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources: Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 0001	2	3	4	5	6	7	8
7	8	9	10	11	12		

B. Hazardous Wastes from Specific Sources: Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes: Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes: Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. Characteristics of Nonlisted Hazardous Wastes: Mark X in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24)

<input checked="" type="checkbox"/> 1. Ignitable (D001)	<input type="checkbox"/> 2. Corrosive (D002)	<input type="checkbox"/> 3. Reactive (D003)	<input type="checkbox"/> 4. Toxic (D000)
---	--	---	--

# XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature David B. Harwood	Name and Official Title (type or print) DAVID B. HARWOOD CHEMICAL ENGINEER	Date Signed 6/25/87
-------------------------------	--	------------------------





I.D. - FOR OFFICIAL USE ONLY

S	W	11	10	4	1	8	1	3	0	9	8	1
1	2	3	4	5	6	7	8	9	10	11	12	13

## IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1 23 - 26	2 23 - 26	3 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 F 0 0 2 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 P 1 2 0 23 - 26	32 U 0 0 2 23 - 26	33 U 0 1 3 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 U 2 2 6 23 - 26	38 U 2 3 9 23 - 26	39 U 1 5 4 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 U 0 4 3 23 - 26	44 U 1 2 2 23 - 26	45 U 1 5 1 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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**E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE  
(D001)

☒ 2. CORROSIVE  
(D002)

☒ 3. REACTIVE  
(D003)

☒ 4. TOXIC  
(D000)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME &amp; OFFICIAL TITLE (type or print)

DATE SIGNED

*Harry H. Schaeffer*  
HARRY H. SCHAEFFER  
SUPERINTENDENT -  
MARYSVILLE / PORT HURON  
8/13/80



## ENVIRONMENTAL PROTECTION AGENCY

## GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.  
Read All Instructions Carefully Before Making Any Entries on Form

## I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

- 1 Non-handler  
 2 Small Quantity Generator  
 4 Exempt  
 5 Beneficial Use  
 9 Closed



Please print/type with elite type (12 characters per inch)

## II. GENERATOR'S EPA I.D. NUMBER

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15  
 M I D I O I 4 1 8 1 3 0 9 8 T/A C

T/A C

This Installation's Non-Regulated Status is Expected to Apply:

- ☒ For 1983 Only ☐ Permanently  
☐ Other \_\_\_\_\_

## III. NAME OF INSTALLATION

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30  
 D E T R O I T E D I S O N C O M A R Y S V I L L E R W R P L T

C303 ENTRY (OFFICIAL USE ONLY): ☐

## IV. INSTALLATION MAILING ADDRESS

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45  
 2 0 0 0 1 S E C O N D A V E / 4 8 5 W C B

Street or P.O. Box

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100  
 D E T R O I T M I 4 8 2 2 6

City or Town

State Zip Code

## V. LOCATION OF INSTALLATION (if different than section IV above)

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45  
 3 0 1 G R A T I O T B L V D

Street or Route number

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100  
 M A R Y S V I L L E M I 4 8 0 4 0

City or Town

State Zip Code

## VI. INSTALLATION CONTACT

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45  
 S T E R L I N G , M O R T O N

Name (last and first)

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100  
 3 1 3 - 2 3 7 - 7 1 4 1

Phone No. (area code &amp; no.)

## VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Charles M. Heidel, President

Print/Type Name

Title

Signature of Authorized Representative

2-24-84

Date Signed



DATE: 2/12/82

NO. ON TAKEN  
PENDING DECISION ON WITHDRAWAL 5WMB  
BY EPA STAFF

RE: Installation Name Detroit Chemical DATE 4/23/82

Installation Address 2000 Second Ave. - Detroit, MD

EPA ID# See attached

FROM: Regulatory Analysis and Information Section

MI DO 41813098

TO: Gene Meyer, Chief  
Technical Programs Section

ATTN: Joe Bayle

Attached for your review is a copy of Letter requesting  
that 9 facilities in Michigan be placed  
on inactive status

for the above-referenced facility.

Cover letter date 1/26/82

Rec'd in Region 2/12/82

Rec'd in RAIS 2/12/82

Action required \_\_\_\_\_

Reviewer's summary: Refer to RAIU for whatever  
action is needed to place these facilities' paperwork  
and database info into "inactive status"  
I believe RAIU has a roster of facilities which  
want to get out of interim status  
"non-regulated" for now. J. Bayle 2/22/82

PLEASE RETURN THIS FORM ALONG WITH ALL RELATED MATERIAL TO  
DENISE BAKER





THIS DOCUMENT WAS RECEIVED WITH OTHER DOCUMENTS. THE POST MARK  
DATE WAS 2/29/84, AND THE WMB RECEIPT DATE WAS

LETTER ATTACHED TO DOCUMENT WITH ID NUMBER M10000722157

Ch  
(LOGGER'S INITIALS)





ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• MID041813098 REACKNOWLEDGEMENT

INSTALLATION ADDRESS

DETROIT EDISON CO MARYSVILLE PWR PLT  
2000 SECOND AVENUE  
DETROIT MI 48226

301 GRATIOT  
MARYSVILLE MI 48040

10/03/81